



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

February 12, 1996

Reply To
Attn Of: HW-107

CERTIFIED MAIL

**LETTER OF ADVISEMENT
AND NOTICE OF CASE CLOSURE**

Mr. Rick H. Fink
Technical Superintendent
Inland Empire Paper Company
3320 N. Argonne
Spokane, WA 99212-2099

Re: Inland Empire Paper Company
TSCA Docket No. 1094-06-05-2615

Dear Mr. Fink:

The United States Environmental Protection Agency Region 10 (EPA) has received the documentation that you sent regarding the early disposal of PCB equipment at the Inland Empire Paper Company in Spokane, Washington. Mr. Rick H. Fink's affidavit and the other information you provided satisfy requirements of the Consent Agreement and Consent Order (CACO) signed on September 28, 1994 in the case above captioned case. No further obligations remain. Accordingly, EPA has closed this case.

Thank you for your cooperation in resolving this matter. If you have any questions, please call me at (206) 553-6693.

Sincerely,

A handwritten signature in cursive script that reads "Daniel L. Duncan".

Daniel L. Duncan
Regional PCB Coordinator
Solid Waste and Toxics Unit

cc: Regional Hearing Clerk

Reply To
Attn Of: HW-107

CERTIFIED MAIL

**LETTER OF ADVISEMENT
AND NOTICE OF CASE CLOSURE**

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Technical Superintendent
Inland Empire Paper Company
3320 N. Argonne
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Re: Inland Empire Paper Company
TSCA Docket No. 1094-06-05-2615

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Sincerely,

Daniel L. Duncan
Regional PCB Coordinator
Solid Waste and Toxics Unit

cc: Regional Hearing Clerk

bcc: Phil Wong, ES-098
Lori Houck, ORC
Dave Croxton, HW-107

CONCURRENCES

INITIALS	LLH	De			
NAME	L. Houck	D. Croxton			
DATE	2/7/96	2/9/96			



INLAND EMPIRE PAPER COMPANY

3320 N. ARGONNE
SPOKANE, WASHINGTON 99212-2099



PHONE 509/924-1911
FAX 509/927-8461

December 4, 1995

Mr. William Hedgebeth
U.S. Environmental Protection Agency
Region 10, M/S AT-083
1200 Sixth Avenue
Seattle, WA 98101

RE: In the Matter of; Inland Empire Paper Company
Docket Number: 1094-06-05-2615

Dear Mr. Hedgebeth:

Pursuant to the Consent Agreement and Consent Order for payment of Civil Penalties (CACO) signed on September 28, 1994, enclosed is our affidavit declaring that Inland Empire Paper Company (IEP) has fulfilled its obligation to incur an expenditure of at least \$4250 for the early removal and disposal of PCB capacitors. IEP is therefore claiming the maximum environmental cleanup credit (\$2125) for the removal and disposal of six large PCB capacitors at a cost of \$4250. IEP has, in good faith, complied with the provisions of the CACO and has taken the initiative to remove from service its remaining PCB large capacitors. All 29 PCB large capacitors were taken out of service on July 13, 1995. These large capacitors were operable and serviceable and were not required to be removed by law or regulation. They were removed as part of IEP's efforts to help ensure a clean environment. All 29 PCB large capacitors were disposed of by incineration in accordance with 40 CFR 761 on August 27 and 28, 1995, by APTUS, Inc. The Certification of Destruction is enclosed.

Enclosed are the following supporting documentation that IEP has removed from service all of its 29 PCB large capacitors:

- 1) A manifest for the transportation of the PCB capacitors from IEP to the G.E. storage facility in Portland, OR.

Inland Empire Paper Company

Mr. William Hedgebeth

Page 2

December 4, 1995

- 2) A list of the serial numbers of the removed capacitors.
- 3) The G.E. invoice for the removal of the six PCB large capacitors.
- 4) The "G.E. Status of Disposal" for the 29 PCB large capacitors.
- 5) The "Certificate of Disposal" for the 29 PCB large capacitors.
- 6) The affidavit declaring IEP has fulfilled all of the obligations of the CACO.

If you have any questions, please don't hesitate to call me at (509) 924-1911.

Sincerely,

Rick H. Fink

Rick H. Fink
Technical Superintendent

mb

Enclosures

Is your RETURN ADDRESS completed on the reverse side?	SENDER: <ul style="list-style-type: none">■ Complete items 1 and/or 2 for additional services.■ Complete items 3, 4a, and 4b.■ Print your name and address on the reverse of this form so that we can return this card to you.■ Attach this form to the front of the mailpiece, or on the back if space does not permit.■ Write "Return Receipt Requested" on the mailpiece below the article number.■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to: Rick H. Fink Technical Superintendent Inland Empire Paper Company 3320 N. Argonne Spokane, WA 99212-2099		4a. Article Number Z 153 015 476	
			4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
	5. Received By: (Print Name) <i>Reuben W. Striegel</i>		7. Date of Delivery	
	6. Signature: (Addressee or Agent) <i>X Reuben W. Striegel</i>		8. Addressee's Address (Only if requested and fee is paid)	
PS Form 3811, December 1994				

Domestic Return Receipt

Thank you for using Return Receipt Service.

RECEIVED

AUG 01 1996

"SWAT Unit"
"OWCM"

EPA REGION 10 - OFFICE OF REGIONAL COUNSEL

CLOSED CASE SUMMARY

DOCKET NUMBER: 1094-06-05-2615 DATE OPENED 6/6/94

CASE NAME: Inland Empire Paper Co.

ATTORNEY: Dewick, L. DATE CLOSED: 7/30/96

REASON:

(SUMMARY OF HOW CASE IS CLOSED FOR GUIDANCE OF OTHER ATTORNEYS)

All Conditions met.



November 29, 1995

Mr. Rick Fink
INLAND EMPIRE PAPER
3320 N. Argonne
Spokane, WA 99212

SUBJECT: PCB SERVICE DISPOSAL
GENERAL ELECTRIC TRACKING NO. 23358

Dear Mr. Fink:

Processing of your materials is completed, and the attached documents detail disposal.

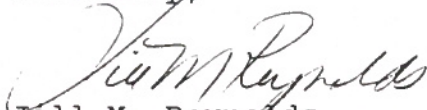
The PCB LOG REPORT shows the description of each item, the outbound manifest number and the date of destruction.

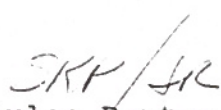
Enclosed for your permanent files are copies of all manifests (not previously sent) for outbound shipments from General Electric to the end disposer. Also included are the certificates of destruction for each corresponding manifest.

This completes our service and we have marked our files closed.

If you have any questions, or if we can be of service to you in any way, please feel free to call (503) 221-5098.

Sincerely,


Jill M. Reynolds
Ship/Rec


Shirlee Porter
Facility Supervisor

Attachments

GENERAL ELECTRIC COMPANY
PORTLAND DECOM FACILITY
PCB LOG REPORT
12/05/95
PAGE NO. 1

2535 NW 28TH AVE
PORTLAND, OR 97210-
EPA ID#: ORD980833537

Job Numbers: 23358*
FSR Numbers: ALL
Customer Numbers: ALL

FOR PERIOD
01/01/80 to 12/05/95

```
=====
ITEM          DESCRIPTION          DATE REMOVED
NO. TYPE PPM MAKE KVA T GAL UNIQUE ID# WEIGHT FROM SERVICE DISPOSAL DESTRUCT
LBS KGS FOR DISPOSAL SHIPPED FACILITY LOCATION MANIFEST # DATE
=====
23358 FSR NO: REC'D: 07/20/95 23358
CUSTOMER: INLAND EMPIRE PAPER, 3320 N. ARGONNE, SPOKANE, WA 99212 (509)924-1191 EPA ID: W40009069279
001 CAP-B >25K CAPACITORS IEP-1 2028 920 07/13/95 08/21/95 APTUS - L ARAGONITE 95071 08/28/95
002 CAP-B >25K CAPACITORS IEP-2 1904 364 07/13/95 08/21/95 APTUS - L ARAGONITE 95071 08/27/95
=====
TOTALS 3932 1784
=====
```


UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
OKD 980 833 537

Manifest Document No.
95071

2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
MULTIPLE GENERATORS/GENERAL ELECTRIC
2535 NW 28TH AVE, PORTLAND, OR 97210

4. Generator's Phone (503) 221-5098

5. Transporter 1 Company Name
TRIAD TRANSPORT

6. US EPA ID Number
OKD 981 588 791

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Manifest Number 918 428 4751

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

APTUS, INC
11600 N APTUS RD
ARAGONITE, UT 84029

10. US EPA ID Number

UTD 081 552 177

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

15. Waste No.

a. Polychlorinated Biphenyls, 9, UN 2315, II, RQ
AP140834

2 CW 178.4 K

b. Polychlorinated Biphenyls, 9, UN 2315, II, RQ
AP140834, AP141145

23 DM 4560 K

c. Polychlorinated Biphenyls, 9, UN 2315, II, RQ
AP100469, AP101007, AP141144

38 DM 7577 K

16. Additional Descriptions for Materials Listed Above

Shed #1354A
PO# 95071

17. Handling Codes for Materials Listed Above

18. Special Handling Instructions and Additional Information

SEE CONTINUATION SHEET

A- Boxes of CAPS

B- DRUMS OF CAPS/BALLAST

C- DRUMS OF OIL/SILICON/WATER

EMERGENCY CONTACT: (800) 424-9300

GE APPARATUS SRVC PACIFIC REGION

SEE GUIDE NO. 31 - SEE ATTACHED

19. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this manifest are fully and accurately described above by proper shipping name and are contained, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

Michael L. Erickson

Michael L. Erickson

08/22/95

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

Vin J. Goodwin

Vin J. Goodwin

08/21/95

18. Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

This was actually received at APTUS - MTN 08/22/95. LRG 08/30/95

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 14

Printed/Typed Name

Signature

Month Day Year

LESLIE GRIFFITH

Leslie Griffith

08/22/95

APTUS

Aptus

P.O. Box 27448
Salt Lake City, Utah 84127-0448

Delivery Address:
11600 North Aptus Road
Aragonite, Utah 84029

(801) 531-4200
FAX (801) 531-4394

NOVEMBER 13, 1995

GENERAL ELECTRIC COMPANY
2535 NW 28TH AVENUE
PORTLAND, OREGON 97210

EPA ID: ORD 980 833 537

PCB

Certificate of Disposal

No. 16560

Customer Manifest: 95071 Document: E3225 destroyed as of NOVEMBER 05, 1995

This is to certify that the hazardous material manifested to Aptus on the above Aptus Document Number was disposed of by incineration in accordance with 40 CFR 761 (and 40 CFR 264 if applicable) as of the above certification date.

Attached is a detailed report which identifies the date(s) of disposal. Residue from this waste has been disposed of at an approved and permitted Hazardous Waste Landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

APTUS, INC.
EPA ID # UTD 981 552 177

E. Marie Headman

Maggie Wilde
Business Manager

Generator: 700686 GENERAL ELECTRIC COMPANY

CD #	Document #	Item State #	Customer #	Types	Weight	Received	Destroyed	Drum	Srl	Num
16560	E3225	1 NONE	95071	CW	1028	08/22/95	08/28/95	IEP-1	23358-1	
16560	E3225	2 NONE	95071	CW	1904	08/22/95	08/27/95	IEP-2	-2	
16560	E3225	3 NONE	95071	DM	116	08/22/95	08/30/95	FAA-950375	23407-1	
16560	E3225	4 NONE	95071	DM	224	08/22/95	08/27/95	23492-17		
16560	E3225	5 NONE	95071	DM	342	08/22/95	08/30/95	23489-001		
16560	E3225	6 NONE	95071	DM	276	08/22/95	08/30/95	23484-001		
16560	E3225	7 NONE	95071	DM	210	08/22/95	08/30/95	23494-001		
16560	E3225	8 NONE	95071	DM	532	08/22/95	08/26/95	23492-09		
16560	E3225	9 NONE	95071	DM	602	08/22/95	08/26/95	23492-13		
16560	E3225	10 NONE	95071	DM	606	08/22/95	08/26/95	23492-10		
16560	E3225	11 NONE	95071	DM	614	08/22/95	08/26/95	23492-12		
16560	E3225	12 NONE	95071	DM	562	08/22/95	08/26/95	23492-04		
16560	E3225	13 NONE	95071	DM	468	08/22/95	08/26/95	23492-05		
16560	E3225	14 NONE	95071	DM	600	08/22/95	08/26/95	23492-11		
16560	E3225	15 NONE	95071	DM	270	08/22/95	08/26/95	23492-14		
16560	E3225	16 NONE	95071	DM	220	08/22/95	08/30/95	23494-02		
16560	E3225	17 NONE	95071	DM	420	08/22/95	08/30/95	23495-01		
16560	E3225	18 NONE	95071	DM	528	08/22/95	08/30/95	23492-06		
16560	E3225	19 NONE	95071	DM	272	08/22/95	08/30/95	23492-15		
16560	E3225	20 NONE	95071	DM	448	08/22/95	08/27/95	23495-03		
16560	E3225	21 NONE	95071	DM	550	08/22/95	08/26/95	23492-08		
16560	E3225	22 NONE	95071	DM	444	08/22/95	08/26/95	23495-02		
16560	E3225	23 NONE	95071	DM	188	08/22/95	08/26/95	23492-16		
16560	E3225	24 NONE	95071	DM	604	08/22/95	08/26/95	23492-07		
16560	E3225	25 NONE	95071	DM	1006	08/22/95	08/30/95	23491-01		
16560	E3225	26 NONE	95071	DM	502	08/22/95	10/11/95	95006-23		
16560	E3225	27 NONE	95071	DM	510	08/22/95	10/11/95	95006-21		
16560	E3225	28 NONE	95071	DM	456	08/22/95	10/11/95	95006-22		
16560	E3225	29 NONE	95071	DM	204	08/22/95	11/05/95	23483X-05		
16560	E3225	30 NONE	95071	DM	460	08/22/95	11/04/95	23483X-02		
16560	E3225	31 NONE	95071	DM	480	08/22/95	11/04/95	23483X-01		
16560	E3225	32 NONE	95071	DM	458	08/22/95	11/03/95	23483X-04		
16560	E3225	33 NONE	95071	DM	476	08/22/95	11/03/95	23483X-03		
16560	E3225	34 NONE	95071	DM	412	08/22/95	10/11/95	95100-30		
16560	E3225	35 NONE	95071	DM	416	08/22/95	10/11/95	95100-27		
16560	E3225	36 NONE	95071	DM	446	08/22/95	10/11/95	23492X-09		
16560	E3225	37 NONE	95071	DM	448	08/22/95	10/11/95	23486-10		
16560	E3225	38 NONE	95071	DM	408	08/22/95	10/11/95	95100-31		
16560	E3225	39 NONE	95071	DM	452	08/22/95	10/11/95	23486-06		
16560	E3225	40 NONE	95071	DM	460	08/22/95	10/11/95	23486-05		
16560	E3225	41 NONE	95071	DM	406	08/22/95	10/11/95	95100-25		
16560	E3225	42 NONE	95071	DM	458	08/22/95	10/11/95	23486-09		
16560	E3225	43 NONE	95071	DM	444	08/22/95	10/11/95	23486-03		
16560	E3225	44 NONE	95071	DM	456	08/22/95	10/11/95	23486-04		
16560	E3225	45 NONE	95071	DM	458	08/22/95	10/11/95	23486-08		
16560	E3225	46 NONE	95071	DM	408	08/22/95	10/11/95	95100-26		
16560	E3225	47 NONE	95071	DM	448	08/22/95	10/11/95	23486-07		
16560	E3225	48 NONE	95071	DM	408	08/22/95	10/11/95	95100-29		
16560	E3225	49 NONE	95071	DM	404	08/22/95	10/11/95	95100-28		
16560	E3225	50 NONE	95071	DM	450	08/22/95	10/11/95	23492X-08		

Generator: 700686 GENERAL ELECTRIC COMPANY

CD #	Document #	Item State #	Customer #	Types	Weight	Received	Destroyed	Drum Srl	Num
16560	E3225	51 NONE	95071	DM	456	08/22/95	10/11/95	23492X-11	.
16560	E3225	52 NONE	95071	DM	462	08/22/95	10/11/95	23492X-07	.
16560	E3225	53 NONE	95071	DM	452	08/22/95	10/11/95	23492X-06	.
16560	E3225	54 NONE	95071	DM	444	08/22/95	10/11/95	23492X-01	.
16560	E3225	55 NONE	95071	DM	442	08/22/95	10/11/95	23492X-04	.
16560	E3225	56 NONE	95071	DM	448	08/22/95	10/11/95	23492X-14	.
16560	E3225	57 NONE	95071	DM	250	08/22/95	10/11/95	23492X-15	.
16560	E3225	58 NONE	95071	DM	440	08/22/95	10/11/95	23492X-03	.
16560	E3225	59 NONE	95071	DM	448	08/22/95	10/11/95	23492X-13	.
16560	E3225	60 NONE	95071	DM	452	08/22/95	10/11/95	23492X-05	.
16560	E3225	61 NONE	95071	DM	452	08/22/95	10/11/95	23492X-02	.
16560	E3225	62 NONE	95071	DM	454	08/22/95	10/11/95	23492X-10	.
16560	E3225	63 NONE	95071	DM	448	08/22/95	10/11/95	23492X-12	.

1
2
3
4
5 BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

6 In the Matter of:)

7 Inland Empire Paper Company,)

8 Respondent.)
9)

Docket No. 1094-06-05-2615

AFFIDAVIT OF RICK H. FINK

10 STATE OF WASHINGTON)
11) ss.
12 County of Spokane)

13 RICK H. FINK, being first duly sworn, on oath deposes and
14 says:

15 1. I am the Technical Superintendent for Inland Empire
16 Paper Company located at North 3320 Argonne, Millwood,
17 Washington 99212.

18 2. I am competent to testify to the matters set out in
19 this Affidavit and am authorized to make the following
20 statements on behalf of Inland Empire Paper Company.

21 3. The Affidavit is given in conjunction with that
22 certain Consent Agreement and Consent Order for Payment of
23 Civil Penalties ("Consent Agreement") entered in the
24 above-referenced matter on September 28, 1994.

25 4. I am the employee at Inland Empire Paper Company
26 responsible for insuring compliance with the above-referenced
27 Consent Agreement and to oversee removal of PCB large
28 capacitors from the Inland Empire Paper Company property.

1 5. The six PCB large capacitors that were the subject of
2 the Consent Order have been removed and disposed of in
3 accordance with 40 C.F.R. §761.60 and other applicable laws.
4 Final certificates of destruction have been submitted to the
5 Regional Office of the Environmental Protection Agency by
6 Inland Empire Paper Company.

7 6. The amount of actual removal and disposal expense
8 incurred by respondent in connection with the removal and
9 disposal of the six PCB large capacitors at Inland Empire
10 Company after the entry of the Consent Order was \$4,250.00.
11 This amount did not include the cost of labor provided by
12 Inland Empire Paper Company or the cost of replacement
13 equipment. No cost was incurred concerning cleanup of releases
14 from the PCB large capacitors since no releases have occurred.

15 7. Attached hereto as Exhibit "A" and by this reference
16 made a part hereof is a confirmation from Inland Empire Paper
17 Company to General Electric Company that the amount to be paid
18 General Electric Company for removal of the six PCB large
19 capacitors is \$4,250.00, and attached hereto as Exhibit "B" and
20 by this reference made a part hereof is a copy of the invoice
21 from General Electric Company concerning the disposal of the
22 six PCB large capacitors. The sum of \$4,250.00 has been paid
23 to General Electric Company.

24 8. The six PCB large capacitors referred to in the
25 Consent Order and in this Affidavit were not required to be
26 removed by law or regulation.

9. The six PCB large capacitors were operable and serviceable at the time of disposal.

Rick H. Fink
RICK H. FINK

SUBSCRIBED AND SWORN to before me this 6th day of December, 1995.

Reuben W. Freife
NOTARY PUBLIC in and for the State
of Washington, residing at Spokane

My appointment expires: 1-18-98



July 25, 1995

Mr. Mike Reynolds
INLAND EMPIRE PAPER
3320 N. Argonne
Spokane, WA 99212

SUBJECT: HAZARDOUS WASTE MANIFEST NO. 23358
GENERAL ELECTRIC TRACKING NO. 23358

Dear Mr. Reynolds:

This letter certifies receipt of your material at the Portland PCB Decommissioning Facility. Attached please find the original copy of the Hazardous Waste Manifest, signed by our representative. These documents should become a part of your permanent files.

You will receive copies of the outbound manifest(s), and the Certificate(s) of Disposal, when this material has been processed and shipped out for final disposition.

Together these documents establish a complete tracking and disposal record for your material.

Should you have any questions please feel free to call (503) 221-5098.

Sincerely,

Jill Reynolds
Shipping /Receiving

att

Emergency Contact Telephone Number

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

W.A.D.O. 0.9.0.6.927.9

Manifest
Doc. No. 233582. Page 1
of 1Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

INLAND EMPIRE PAPER

3320 N. ARGONNE

, SPOKANE

, WA

99212

4. Generator's Phone (509 924-1911

5. Transporter 1 Company Name

GENERAL ELECTRIC COMPANY

6. US EPA ID Number

ORD 980 833 537 . . .

7. Transporter 2 Company Name

8. US EPA ID Number

.

9. Designated Facility Name and Site Address

GENERAL ELECTRIC COMPANY

2535 NW 28TH AVE

PORTLAND , OR

97211

10. US EPA ID Number

ORD 980 833 537 . . .

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 503 221-5098

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

503 221-5098

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No.

Type

13.
Total
Quantity14.
Unit
Wt/Vol1.
Waste No.a. Polychlorinated Biphenyls,
X 9, UN 2315, II, RQ

462 c.w. 1.495 K 1002

b. Polychlorinated Biphenyls,
X 9, UN 2315, II, RQc. Polychlorinated Biphenyls,
X 9, UN 2315, II, RQ

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

A) (2) BOXES OF CAPACITORS

ID# IEP-1

ID# IEP-2

O/S 7-13-95 K 750 O/S 7-13-95 K 745

EMERGENCY CONTACT: (800) 424-9300

GE APPARATUS SRVC PACIFIC REGION

SEE GUIDE NO. 31 — SEE ATTACHED

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Rick H. Fink

Signature

Rick H Fink

Month Day Year

10.7.1.8.9.5

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Robert E Ramsey

Signature

Robert E Ramsey

Month Day Year

10.7.1.8.9.5

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

.

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Carl A Archey

Signature

Carl A Archey

Month Day Year

10.7.20.9.5

ORIGINAL-RETURN TO GENERATOR

7-BLS-C6
Rev. 10/92

PCB CAPACITOR DISPOSAL LIST

PCB capacitors out of service: July 13, 1995
PCB capacitors out of the mill: July 18, 1995
Manifest Document No. 23358
Transporter: General Electric (503) 221-5098
US EPA ID Number: ORD 980 833 537
Storage Site: General Electric
2535 NW 28 th Ave.,
Portland, OR 97211
EPA ID. ORD 980 833 537

IEP BOX No. 1 contents:

PCB large capacitor serial numbers:

65L5469
65J5985
65L5767
65L5455
65L5450
65L5464
65L5447
65K4396
65L5445
65L5456
65L5461
65L5550
65K4309
65L5427
65L5454

IEP BOX No. 2 contents:

PCB large capacitor serial numbers:

65L5742
65L5564
65L5460
65L5452
65K4370
65L5451
65L5444
65L5567
65J4079
65L5738
65L5563
65L5406
69033853
65L5436



GE Power
Generation

General Electric Company,
Attention: Environmental Services,
2000 West 10th Avenue, Portland, OR 97201

September 7, 1995

Mr. Rick Fink
INLAND EMPIRE PAPER
3320 N. Argonne
Spokane, WA 99212

SUBJECT: STATUS OF DISPOSAL
GENERAL ELECTRIC TRACKING NO. 23358

Dear Mr. Fink:

Attached please find a copy of our PCB LOG PRINT-OUT tracking your material sent to us as of 07/20/95.

Still outstanding are:

All items have been shipped for disposal and we await the receipt of the signed manifest and certificate of destruction.

Upon receipt of the final disposal documents, we will post the date of destruction to our records and forward copies for your files.

Enclosed for your permanent files are copies of outbound manifests (not previously sent), which your materials have been shipped out on. The PCB LOG REPORT indicates by item each manifest number.

If you have any questions, please do not hesitate to contact us at (503) 221-5098. We appreciate the opportunity to be of service, and look forward to serving your future needs.

Sincerely,

Jill Reynolds
Ship/Rec.

GENERAL ELECTRIC COMPANY
 PORTLAND DECOM FACILITY
 PCB LOG REPORT
 09/01/95
 PAGE NO. 1

2535 NW 28TH AVE
 PORTLAND, OR 97210-
 EPA ID#: OR098033537

Job Numbers: 23358*
 FSR Numbers: ALL
 Customer Numbers: ALL

FOR PERIOD
 01/01/90 to 09/01/95

ITEM NO.	TYPE	PPM	MAKE	KVA	T	GAL	UNIQUE ID#	WEIGHT LBS	KGS	DATE REMOVED FROM SERVICE	FOR DISPOSAL	SHIPPED	DISPOSAL FACILITY	LOCATION	MANIFEST #	DESTRUCT DATE	
23358	FSR NO:						REC'D: 07/20/95									23358	
CUSTOMER: INLAND EMPIRE PAPER, 3320 N. ARGONNE, SPOKANE, WA 99212 (509)924-1191 EPA ID: WA0009069279																	
001	CAP-B	>25K	CAPACITORS				IEP-1	2028	920	07/13/95	08/21/95	APTUS - L	DRAGONITE 95071				
002	CAP-B	>25K	CAPACITORS				IEP-2	1904	864	07/13/95	08/21/95	APTUS - L	DRAGONITE 95071				
TOTALS								3932	1784								



GE Industrial and Power Systems

GENERAL ELECTRIC COMPANY
CORPORATE POOLED SERVICES

P.O. BOX 641469

PITTSBURGH

PA 152641469

DUE UPON RECEIPT

INVOICE NUMBER 03931		GE REFERENCE NO. 437P1019	PAYMENT TERMS	
INVOICE NUMBER 881385611		INVOICE DATE 062395	PAGE 01	
BILLED TO INLAND EMPIRE PAPER CO 3320 N ARGONNE MILLWOOD PLANT SPOKANE WA 99212		SHIPPED TO INLAND EMPIRE PAPER CO 3320 N ARGONNE MILLWOOD PLANT MILLWOOD WA 99212		
DATE SHIPPED 062395	SHIPPED FROM	SHIPPED VIA	TRANSPORTATION TERMS	

DISPOSAL OF (6) EXISTING PCB CAPACITORS
PER GE PROPOSAL 437P1019.

PLEASE DIRECT ANY QUESTIONS REGARDING
THIS INVOICE TO MAGGI SHERWIN,
510-256-2537. THANK YOU.

TOTAL AMOUNT BILLED

EXTENDED AMOUNT
4250.00

\$4250.00

Sole of any service (including any goods) covered by this invoice is conditioned upon the terms contained in the original quotation or acknowledgement of order, if any, otherwise upon the terms contained herein, including those on the back of the ORIGINAL INVOICE. Any additional or different terms proposed by the customer are objected to and will not be binding upon the Company, unless specifically assented to in writing by the Company's authorized representative. Note that no implied warranty of merchantability or fitness for purpose applies and that any claim that the services described herein are a warranty or other obligation of the Company must be made in writing prior to, or at, the time you place your order. Seller certifies that all goods described herein were produced in compliance with all applicable provisions of the Fair Labor Standards Act, as amended.



GE Industry Sales & Services
Quotation for Services

GEISS FORM 487(Q)

QUOTATION NO. 437P1019

DATE September 9, 1994

NOTICE: This quotation is void unless accepted within 30 days date hereof and is subject to change upon notice. However, if GE elects to perform the services covered by the quotation in response to an order placed 30 or more days after the date of the quotation, the terms of the quotation will apply.

to Mr. Wayne Andresen

Inland Empire Paper Co.

N. 3320 Argonne Road

Spokane, WA 99206

Type of Service

☐ Installation/Repair/Maintenance

☐ Field Engineering Service

☐ Job Management Service

☐ Training Service

☐ Engineering Study/Inspection/Test

☐ PCB Service

Work Description, Completion, Price- GE Industry Sales and Services (GE) agrees as follows:

General Electric Installation & Service Engineering is pleased to submit this proposal to dispose of (6) existing PCB capacitors located on your 4160V system. This proposal replaces GE-I&SE proposal 437P1007 dated 8/3/94.

GE will supply a box(es) or drum(s) for loading the old non-leaking capacitors into, and dispose of the PCB capacitors at an EPA approved incinerator of GE's choice.

IEP will provide necessary manpower to remove the PCB capacitors and load them into the provided box(es) or drum(s) and load them onto the GE truck.

Lump Sum Price

\$ 4,250.00

This Quotation is for a contract to be performed by GE Industry Sales and Services and is subject to the Conditions of Sale, GEISS Forms 487(CS), and 487(PCB) attached.

GENERAL ELECTRIC COMPANY (GE)

By Edward L. Schafer

Title Area Engineer

Address E. 12720 Nora, Suite E

Spokane, WA 99216

509-891-1511, 800-533-5885

WORKSCOPE

GE to provide capacitor box(es) or drum(s).

GE to provide a truck to transport the loaded capacitor box(es) or drum(s) for disposal after it is filled by IEP.

GE to dispose of capacitors at an EPA approved incinerator of GE's choice.

CUSTOMER'S RESPONSIBILITIES

Capacitors must be non-leaking and able to be loaded into boxes. If any capacitors are leaking, they must be placed into a new 17-C drum (either provided by IEP or provided to IEP by GE at extra cost to IEP).

IEP to provide men and equipment to remove PCB capacitors from capacitor rack and load into boxes supplied by GE.

IEP to provide men and equipment to load filled capacitor box onto GE truck.

WORK PERIOD

Standard work period for GE truck driving personnel is Monday through Friday, 7:30 am to 3:30 pm. Any work required to be performed outside of this work period will be billed at the standard rates in effect at the time the work is done.

PRICE AND PAYMENT

Prices shown are exclusive of taxes.

TOTAL PRICE \$
4,250.00

Disposal services price based on one capacitor box or drum filled with (6) 100 KVAR non-leaking capacitors, weighing a maximum of 600 pounds (including box). The price for any weight over the 600 pound maximum will be \$ 2.50/lb.

BH

RECEIVED
OCT 2 1995

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

IN THE MATTER OF:)
INLAND EMPIRE PAPER COMPANY,) Docket No. 1094-06-05-2615
Respondent.) MOTION, STIPULATION, AND
ORDER TO AMEND
CONSENT AGREEMENT AND
CONSENT ORDER

MOTION AND STIPULATION

The Parties in the above-entitled matter jointly request and stipulate to an amendment of the Consent Agreement and Consent Order (CACO) issued in this matter. In a letter and affidavit, attached hereto as Exhibit 1, Respondent has provided Complainant EPA with information that it has incurred \$4,250 to dispose of 6 large PCB capacitors, but has not received the Certificates of Disposal from the disposal facility. Therefore, the Parties jointly request that the Court issue an order amending the CACO to extend the completion date by which Respondent must file an affidavit certifying that it has met the terms of the CACO to December 12, 1995.

Dated: 9/27/95

Wayne W. Anderson per written authorization 9/26/95
FOR RESPONDENT

Dated: 9/27/95

Jore L. Hancock
FOR EPA

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Dated:

for Charles F. Clarke
CHUCK CLARKE
Regional Administrator

Docket No. 1094-06-05-2615

CERTIFICATE OF SERVICE

I certify that the forgoing Motion, Stipulation, and Order To Amend Consent Agreement and Consent Order was sent to the following persons, in the manner specified, on the date below:

Original hand-delivered: Mary Shillcutt
Regional Hearing Clerk
U.S. EPA
Region X
1200 Sixth Avenue, SO-155
Seattle, Washington 98101

Copy by first class mail: Rick Fink
Inland Empire Paper Company
N. 3320 Argonne
Spokane, Washington 99212-2099

Dated: 9/25/95

Trina Bortko
Trina Bortko
U.S. EPA, Region X



INLAND EMPIRE PAPER COMPANY

N. 3320 ARGONNE
SPOKANE, WASHINGTON 99212-2099

PHONE 509/924-1911

FAX 509/927-8461

September 12, 1995

RECEIVED
SEP 22 1995

PESTICIDES & TOXIC SUBSTANCES
BRANCH-EPA REGION 10

U.S. Environmental Protection Agency
Region 10, M/S AT-083
1200 Sixth Avenue
Seattle, WA 98101

Attn: Mr. William Hedgebeth

Dear Mr. Hedgebeth:

RE: In the matter of: Inland Empire Paper Company
Docket No. 1094-06-05-2615

Pursuant to the Consent Agreement and Consent Order for Payment of Civil Penalties (CACO) signed on September 28, 1994, enclosed is our affidavit declaring that Inland Empire Paper Company (IEP) has fulfilled its obligation to incur an expenditure of at least \$4,250 for the early removal and disposal of PCB capacitors. IEP is therefore claiming the maximum environmental cleanup credit (of \$2,125) for the removal and disposal of 6 large PCB capacitors at a cost of \$4,250. Although IEP has fulfilled its obligation to remove 6 large PCB capacitors for disposal in accordance with 40 CFR 761.601, the capacitors to this date are awaiting disposal at the APTUS, Araganite, Utah, site. It could take up to 120 days before the disposal certificate is issued. IEP is therefore requesting an extension to the September 28 deadline for the submittal of the Certificate of Disposal. IEP has, in good faith, complied with the provisions of the CACO, and also took the initiative to remove from service its remaining PCB large capacitors. All 29 PCB large capacitors were taken out of service on July 13, 1995, and shipped for disposal to the GE storage site in Portland on July 18, 1995. Since August 21, 1995, all 29 large PCB capacitors are at the APTUS site in Araganite, Utah, awaiting final disposal. The final Certificate of Destruction will be submitted to your office as soon as it becomes available.

Inland Empire Paper Company

Mr. William Hedgebeth
U.S. Environmental Protection Agency
Page 2
September 12, 1995

Also enclosed is the supporting documentation that IEP has removed from service all of its 29 PCB large capacitors:

1. A manifest for the transportation of the PCB capacitors from IEP to the GE storage facility in Portland, Oregon.
2. A list of the serial numbers of the removed capacitors.
3. The GE invoice for the disposal of the 6 PCB large capacitors.
4. The "GE Status of Disposal" for the 29 PCB large capacitors.

If you have any questions, please give me a call at (509)924-1911. I look forward to your response regarding an extension for the submittal of the Certificate of Destruction.

Sincerely,



Rick H. Fink
Technical Superintendent

cy

Enclosures



GE Power
Generation

July 25, 1995

Decommissioning Facility
General Electric Company
2000 1st Avenue, Portland, OR 97210

Mr. Mike Reynolds
INLAND EMPIRE PAPER
3320 N. Argonne
Spokane, WA 99212

SUBJECT: HAZARDOUS WASTE MANIFEST NO. 23358
GENERAL ELECTRIC TRACKING NO. 23358

Dear Mr. Reynolds:

This letter certifies receipt of your material at the Portland PCB Decommissioning Facility. Attached please find the original copy of the Hazardous Waste Manifest, signed by our representative. These documents should become a part of your permanent files.

You will receive copies of the outbound manifest(s), and the Certificate(s) of Disposal, when this material has been processed and shipped out for final disposition.

Together these documents establish a complete tracking and disposal record for your material.

Should you have any questions please feel free to call (503) 221-5098.

Sincerely,

Jill Reynolds
Shipping /Receiving

att

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. U.A.D.O.0.9.0.6.927.9	Manifest No. 23358	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address INLAND EMPIRE PAPER 3320 N. ARGONNE, SPOKANE, WA 99212				A. State Manifest Document Number	
4. Generator's Phone (509 924-1911)				B. State Generator's ID	
5. Transporter 1 Company Name GENERAL ELECTRIC COMPANY		6. US EPA ID Number ORD 980 833 537		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 503 221-5098	
9. Designated Facility Name and Site Address GENERAL ELECTRIC COMPANY 2535 NW 28TH AVE PORTLAND, OR 97211		10. US EPA ID Number ORD 980 833 537		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 503 221-5098	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers	13. Total Quantity
				No.	Unit
				Type	Wt/Vol
a. Polychlorinated Biphenyls, 9, UN 2315, II, RQ				002 c.w.	1.495 K
b. Polychlorinated Biphenyls, 9, UN 2315, II, RQ					
c. Polychlorinated Biphenyls, 9, UN 2315, II, RQ					
d.					
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above	
15. Special Handling Instructions and Additional Information					
A) (2) BOXES OF CAPACITORS ID# IEP-1 ID# IEP-2 O/S 7-13-95 K 750 O/S 7-13-95 K 745					
EMERGENCY CONTACT: (800) 424-9300 GE APPARATUS SRVC PACIFIC REGION SEE GUIDE NO. 31 — SEE ATTACHED					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name RICK H. FINK		Signature Rick H Fink		Month Day Year 10/7/18/95	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name ROBERT E RAMSEY		Signature Robert E Ramsey	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name Carl A Archey		Signature Carl A Archey		Month Day Year 10/7/20/95	

ORIGINAL-RETURN TO GENERATOR

PCB CAPACITOR DISPOSAL LIST

PCB capacitors out of service: July 13, 1995
PCB capacitors out of the mill: July 18, 1995
Manifest Document No. 23358
Transporter: General Electric (503) 221-5098
US EPA ID Number: ORD 980 833 537
Storage Site: General Electric
2535 NW 28 th Ave.,
Portland, OR 97211
EPA ID. ORD 980 833 537

IEP BOX No. 1 contents:

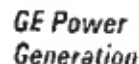
PCB large capacitor serial numbers:

65L5469
65J5985
65L5767
65L5455
65L5450
65L5464
65L5447
65K4396
65L5445
65L5456
65L5461
65L5550
65K4309
65L5427
65L5454

IEP BOX No. 2 contents:

PCB large capacitor serial numbers:

65L5742
65L5564
65L5460
65L5452
65K4370
65L5451
65L5444
65L5567
65J4079
65L5738
65L5563
65L5406
69033853
65L5436

[illegible]

Mr. Rick Fink
INLAND EMPIRE PAPER
3320 N. Argonne
Spokane, WA 99212

SUBJECT: STATUS OF DISPOSAL
GENERAL ELECTRIC TRACKING NO. 23358

Attached please find a copy of our PCB LOG PRINT-OUT tracking your material sent to us as of 07/20/95.

All items have been shipped for disposal and we await the receipt of the signed manifest and certificate of destruction.

Upon receipt of the final disposal documents, we will post the date of destruction to our records and forward copies for your files.

Enclosed for your permanent files are copies of outbound manifests (not previously sent), which your materials have been shipped out on. The PCB LOG REPORT indicates by item each manifest number.

If you have any questions, please do not hesitate to contact us at (503) 221-5098. We appreciate the opportunity to be of service, and look forward to serving your future needs.

Sincerely,

Jill Reynolds
Ship/Rec.

GENERAL ELECTRIC COMPANY
 PORTLAND DECON FACILITY
 PCB LOG REPORT
 09/01/95
 PAGE NO. 1

2535 NW 28TH AVE
 PORTLAND, OR 97210-
 EPA ID#: OR0900831537

Job Numbers: 23358*
 FSR Numbers: ALL
 Customer Numbers: ALL

FOR PERIOD
 01/01/80 to 09/01/95

ITEM NO.	TYPE	PPM	DESCRIPTION MAKE	KVA	T	GAL	UNIQUE ID#	WEIGHT LBS	KGS	DATE REMOVED FROM SERVICE	FOR DISPOSAL	SHIPPED	DISPOSAL FACILITY	LOCATION	MANIFEST #	DESTRUCT DATE	
23358			FSR NO:				REC'D: 07/20/95									23358	
CUSTOMER: INLAND EMPIRE PAPER, 3320 N. ARGONNE, SPOKANE, WA 99212 (509)924-1191 EPA ID: WA0009009279																	
001	CAP-B	>25K	CAPACITORS				IEP-1	2028	920	07/13/95	08/21/95	APTUS - L	DRAGONITE 95071				
002	CAP-B	>25K	CAPACITORS				IEP-2	1904	864	07/13/95	08/21/95	APTUS - L	DRAGONITE 95071				
TOTALS								3932	1784								

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5 BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

6 In the Matter of:)
7 Inland Empire Paper Company,) Docket No. 1094-06-05-2615
8 Respondent.) AFFIDAVIT OF RICK H. FINK
9)

10 STATE OF WASHINGTON)
11) ss.
12 County of Spokane)

13 RICK H. FINK, being first duly sworn, on oath deposes and
14 says:

15 1. I am the Technical Superintendent for Inland Empire
16 Paper Company located at North 3320 Argonne, Millwood,
17 Washington 99212.

18 2. I am competent to testify to the matters set out in
19 this Affidavit and am authorized to make the following
20 statements on behalf of Inland Empire Paper Company.

21 3. The Affidavit is given in conjunction with that
22 certain Consent Agreement and Consent Order for Payment of
23 Civil Penalties ("Consent Agreement") entered in the
24 above-referenced matter on September 28, 1994.

25 4. I am the employee at Inland Empire Paper Company
26 responsible for insuring compliance with the above-referenced
27 Consent Agreement and to oversee removal of PCB large
28 capacitors from the Inland Empire Paper Company property.

1 5. The six PCB large capacitors that were the subject of
2 the Consent Order have been removed and disposed of in
3 accordance with 40 C.F.R. §761.60 and other applicable laws.
4 However, the capacitors, as of the date of this Affidavit, are
5 awaiting disposal at the APTUS Araganite, Utah, facility, where
6 they have been located since August 21, 1995. Final
7 certificates of destruction will be submitted to the Regional
8 Office of the Environmental Protection Agency upon receipt by
9 Inland Empire Paper Company.

10 6. The amount of actual removal and disposal expense
11 incurred by respondent in connection with the removal and
12 disposal of the six PCB large capacitors at Inland Empire
13 Company after the entry of the Consent Order was \$4,250.00.
14 This amount did not include the cost of labor provided by
15 Inland Empire Paper Company or the cost of replacement
16 equipment. No cost was incurred concerning cleanup of releases
17 from the PCB large capacitors since no releases have occurred.

18 7. Attached hereto as Exhibit "A" and by this reference
19 made a part hereof is a confirmation from Inland Empire Paper
20 Company to General Electric Company that the amount to be paid
21 General Electric Company for removal of the six PCB large
22 capacitors is \$4,250.00, and attached hereto as Exhibit "B" and
23 by this reference made a part hereof is a copy of the invoice
24 from General Electric Company concerning the disposal of the
25 six PCB large capacitors. The sum of \$4,250.00 has been paid
26 to General Electric Company.
27
28

8. The six PCB large capacitors referred to in the Consent Order and in this Affidavit were not required to be removed by law or regulation.

Rick H Fink
 RICK H. FINK

SUBSCRIBED AND SWORN to before me this 20th day of September, 1995.

Reuben W. Strauf
NOTARY PUBLIC in and for the State
of Washington, residing at Spokane

My appointment expires: 1-18-98



INLAND EMPIRE PAPER COMPANY

3320 N. ARGONNE
SPOKANE, WASHINGTON 99212

PHONE 509/924-1911
FAX 509/927-8461

GENERAL ELECTRIC COMPANY
12720 E. NORA, SUITE E
SPOKANE, WA 99216

DATE 11/09/94

P.O. NO. 03931

SUBMIT ALL INVOICES IN DUPLICATE
SHOWING OUR ORDER NUMBER

PLEASE ENTER OUR ORDER FOR THE FOLLOWING:

1	DISPOSAL OF SIX (6) EXISTING PCB CAPACITORS LOCATED ON 4160V SYSTEM PER PROPOSAL #437P1019. G.E. TO SUPPLY BOX(ES) OR DRUM(S) TO LOAD OLD NON-LEAKING CAPACITORS AND DISPOSE OF PCB CAPACITORS AT AN EPA APPROVED INCINERATOR OF G.E.'S CHOICE. IEP WILL PROVIDE MANPOWER TO REMOVE AND LOAD PCB CAPACITORS INTO PROVIDED BOX(ES) OR DRUM(S) AND LOAD ONTO G.E. TRUCK.	4,250.00
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CONFIRMATION

ACCT. NO.

PLEASE ACKNOWLEDGE WITH SHIPPING DATE

VIA _____

Inland Empire Paper Company

PER [Signature]
PURCHASING AGENT

PAPER MAKERS SINCE 1911

EXHIBIT A



GE Industrial and Power Systems

GENERAL ELECTRIC COMPANY
CORPORATE SPOOLED SERVICES

P.O. BOX 641469

PITTSBURGH PA 152641469

DUE UPON RECEIPT

CUSTOMER ORDER NUMBER 03931		PROPOSAL NUMBER 437P1019		INVOICE NUMBER 881385611		INVOICE DATE 062395		PAGE 01	
BILLED TO INLAND EMPIRE PAPER CO 3320 N ARGONNE MILLWOOD PLANT SPOKANE WA 99212					SHIPPED TO INLAND EMPIRE PAPER CO 3320 N ARGONNE MILLWOOD PLANT MILLWOOD WA 99212				
DATE SHIPPED 062395		SHIPPED FROM		CARRIER		TRANSPORTATION TERMS			

DISPOSAL OF (6) EXISTING PCB CAPACITORS
PER GE PROPOSAL 437P1019.

PLEASE DIRECT ANY QUESTIONS REGARDING
THIS INVOICE TO MAGGI SHERWIN,
510-256-2537. THANK YOU.

TOTAL AMOUNT BILLED

EXTENDED AMOUNT

\$4250.00

\$4250.00

EXHIBIT B

INVOICE COPY

Sole of any service (including any goods) covered by this invoice is conditioned upon the terms contained in the original quotation or acknowledgement of order, if any, otherwise upon the terms contained herein, including those on the back of the ORIGINAL INVOICE. Any additional or different terms proposed by the customer are objected to and will not be binding upon the Company, unless specifically assented to in writing by the Company's authorized representative. Note that no implied warranty of merchantability or fitness for purpose applies and that any claim that the services described herein are a warranty or other obligation of the Company must be made in writing prior to, or at, the time you place your order. Seller certifies that all goods described herein were produced in compliance with all applicable provisions of the Fair Labor Standards Act, as amended.



INLAND EMPIRE PAPER COMPANY

N. 3320 ARGONNE
SPOKANE, WASHINGTON 99212-2099

RECEIVED

94 OCT 26 PM 12:16

HEARINGS CLERK
EPA--REGION 10

PHONE 509/924-1911
FAX 509/927-8461

October 20, 1994

U.S. Environmental Protection Agency
(Region 10 Hearing Clerk)
P.O. Box 360903M
Pittsburgh, PA 15251

RE: CACO for Payment of Civil Penalties
Docket Number 1094-06-05-2615

To Whom It May Concern:

Please find enclosed a certified check for \$2,125 as stipulated under the CACO for payment of the civil penalties against Inland Empire Paper Company, Docket No. 1094-06-05-2615.

The remaining \$2,125 of the assessed penalty will be used as credit towards the \$4,150 expenditure for the disposal of existing PCB capacitors as specified in the terms of the CACO. Upon completion of the PCB capacitor disposal, an affidavit and supporting documentation will be submitted to the EPA office of Mr. William Hedgebeth.

If you have any questions, please call me at (509) 924-1911.

Sincerely,

Wayne D. Andresen
Vice President and
General Manager

mb



INLAND EMPIRE PAPER COMPANY
3320 N. ARGONNE
SPOKANE, WA 99212-2099

87100

CHECK NO. 100361

VENDOR

UNITED STATES TREASURER

100361

INVOICE NUMBER	ACCOUNT NO.	DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
101794			2,125.00		2,125.00
VR-10-113			TOTALS	2,125.00	2,125.00

DETACH BEFORE DEPOSITING CHECK

 3135 NO CERTIFIED PAY TO THE ORDER OF UNITED STATES TREASURER P.O. BOX 360703 PITTSBURGH PENNSYLVANIA 15251 WASHINGTON TRUST BANK SPOKANE WASHINGTON	INLAND EMPIRE PAPER COMPANY 3320 N. ARGONNE • SPOKANE, WASHINGTON 99212-2099		No. 100361	
	INLAND EMPIRE PAPER CO.		CHECK DATE 10/18/94	
	2,125dols00cts		CHECK AMOUNT \$*****2,125.00	
	DO NOT DESTROY		 Thomas Streifel	

(b) (6)

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EPA REGION 10

12221



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

SEP 28 1994

RECEIVED
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HEARINGS CLERK
EPA--REGION 10

Reply To
Attn Of: S0-155

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Wayne Andresin
Vice President
Inland Empire Paper Company
North 332 Argonne Road
Spokane, Washington 99212

Re: In the Matter of: Inland Empire Paper Co.,
Docket No. 1094-06-05-2615

Dear Mr. Andresin:

Enclosed is a conformed copy of the Consent Agreement and Consent Order for Payment of Civil Penalties (CACO) which the Acting Regional Administrator signed on September 28, 1994. The original CACO is filed with the Regional Hearing Clerk.

Pursuant to the CACO, payment of the civil penalty of \$2,125 is due no later than October 28, 1994. You mentioned in your letter that you would mail the payment to the EPA address here in Seattle. Actually, the payment is mailed to the Pittsburgh, Pennsylvania address as specified in Paragraph 19 of the CACO. Failure to comply with the terms of the CACO will result in the assessment of interest, handling charges, and nonpayment penalties in accordance with Paragraph 21.

On behalf of the U.S. Environmental Protection Agency, thank you for your cooperation in reaching a satisfactory resolution in this matter.

Sincerely,

Lori L. Houck
Lori Houck
Assistant Regional Counsel

Enclosure

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SEP 30 1994

PESTICIDES & TOXIC SUBSTANCES
BRANCH-EPA REGION 10

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HEARINGS CLERK
EPA--REGION 10

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:)	
)	Docket No. 1094-06-05-2615
Inland Empire Paper Company)	
)	
Respondent.)	CONSENT AGREEMENT AND CONSENT
)	ORDER FOR PAYMENT OF CIVIL
)	PENALTIES

I. PRELIMINARY STATEMENT

1. The United States Environmental Protection Agency ("EPA") initiated this proceeding for the assessment of civil penalties pursuant to Section 16(a) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2615(a), by issuing a complaint against Respondent, Inland Empire Paper Company ("Respondent"), on July 18, 1994 ("Complaint").

2. The Complaint charged Respondent with violation of the Polychlorinated Biphenyls ("PCB") regulations, 40 C.F.R. Part 761, in violation of TSCA Section 15, 15 U.S.C. § 2614, at its facility in Spokane, Washington ("Facility"), and sought the imposition of a \$5,000 penalty. The Complaint alleged a

1 violation of the notification requirements of 40 C.F.R.

2 § 761.202(b)

3 3. As a result of information exchanged during
4 settlement negotiations, EPA and Respondent have agreed to
5 resolve this matter by executing this Consent Agreement and
6 Consent Order ("CACO").

7
8 II. CONSENT AGREEMENT

9 4. Respondent admits the jurisdictional allegations
10 contained in the Complaint.

11 5. Respondent neither admits nor denies the factual
12 allegations, findings, or conclusions of law contained in the
13 Complaint.

14 6. Respondent took prompt action to come into
15 compliance with the PCB regulations and has shown a willingness
16 to settle this matter without further litigation. Accordingly,
17 in conformance with EPA's PCB Penalty Policy dated April 9, 1990,
18 ("Penalty Policy"), EPA agrees to reduce the proposed penalty of
19 \$5,000 by 15 percent, to \$4,250.

20 7. Respondent agrees to the assessment of this \$4,250
21 penalty.

22 8. Respondent has informed EPA that it will incur at
23 least \$4,250 in costs for the early removal and disposal of PCB
24 large capacitors by no later than the 1-year anniversary of the
25 entry of this CACO. Therefore, in accordance with the Penalty
26 Policy, EPA agrees that up to 50 percent of the assessed penalty

may be mitigated as set forth in the Consent Order below.

9. Respondent waives its right to request an adjudicatory hearing on any issue addressed in this CACO.

10. Respondent agrees not to claim or attempt to claim a federal income tax deduction or credit covering all or any part of the civil penalty paid to the United States Treasurer.

11. Respondent represents that it is duly authorized to execute this CACO and that the party signing this CACO on its behalf is duly authorized to bind Respondent to the terms of this CACO.

12. Respondent and EPA agree to issuance of the Consent Order below.

III. CONSENT ORDER

IT IS HEREBY ORDERED and ADJUDGED as follows:

13. For the reasons set forth above, Respondent is hereby assessed a penalty in the amount of \$4,250..

14. Respondent shall pay \$2,125 of the assessed penalty no later than 30 days from the date of entry of the CACO.

15. The remaining \$2,125 of the assessed penalty is suspended and deferred until the 1-year anniversary of the entry of this CACO, at which time it shall be immediately due and payable, together with all interest accrued thereon in accordance with Paragraph 21 below, without further proceedings, notice, or order, EXCEPT as provided in Paragraph 16 below.

16. Respondent shall be entitled to a credit against

1 the suspended and deferred portion of the assessed penalty if
2 Respondent complies with Paragraph 17 below, but only to the
3 extent such credit is allowed by EPA in accordance with
4 Paragraph 18 below. The maximum amount of such credit ("Maximum
5 Credit") shall be equal to one-half of the amount actually spent
6 by Respondent for the early removal and disposal of PCB
7 capacitors (as reflected in the affidavit referred to in
8 Paragraph 18 below), but not to exceed \$2,125.

9 17. On or before the 1-year anniversary of the entry
10 of this CACO, Respondent shall file with the Regional Hearing
11 Clerk an affidavit stating:

12 a. that PCB large capacitors have been removed
13 and disposed of in accordance with 40 C.F.R. § 761.60
14 and other applicable law;

15 b. the amount of actual removal and disposal expenses
16 incurred by Respondent in connection with the early removal
17 and disposal of the PCB large capacitors at the Facility
18 after the entry of this CACO (which amount shall not include
19 the cost of labor provided by Respondent, the cost of
20 replacement equipment, or the cost of cleanup of releases
21 from the PCB large capacitors);

22 c. that the PCB large capacitors referred to in
23 Subparagraphs a and b above have been disposed of in
24 accordance with 40 C.F.R. § 761.60 and other applicable
25 law;

d. that the PCB large capacitors referred to in Subparagraphs a and b above were not required to be removed by law or regulation; and

e. with respect to the disposal of any PCB large capacitors, that such PCB large capacitors were operable and serviceable at the time of disposal.

The affidavit shall be accompanied by appropriate documentation to verify the amount of such actual disposal expenditures (such as invoices and receipts) and the proper disposal of the PCB large capacitors (such as manifests and disposal certificates).

A copy of the affidavit and supporting documentation shall be sent to:

U.S. Environmental Protection Agency
Region 10 M/S AT-083
1200 Sixth Avenue
Seattle, Washington 98101
Attn: William Hedgebeth

18. No later than 30 days after the affidavit and documentation specified in Paragraph 17 have been filed, EPA shall file a statement setting forth the precise amount of any credit allowed by EPA and explaining the basis for the denial of any credit for expenditures requested by Respondent.

a. If EPA does not respond to Respondent's timely filing within such 30-day period, EPA shall be deemed to have waived, for civil purposes only, its right to make such a contention, and Respondent shall be entitled to the Maximum Credit.

1 b. If EPA files a statement in a timely manner
2 disputing the amount of expenditures claimed by Respondent,
3 Respondent shall be entitled only to such credit against the
4 suspended and deferred portion of the assessed penalty as
5 allowed by EPA in such statement, and the remainder of the
6 suspended and deferred portion shall become immediately due
7 and payable, with interest.

8 19. All payments under this CACO shall be made by
9 mailing a certified check or money order, payable to the United
10 States Treasurer, to:

11 U.S. Environmental Protection Agency
12 (Region 10 Hearing Clerk)
13 P.O. Box 360903M
14 Pittsburgh, Pennsylvania 15251

15 A transmittal letter indicating Respondent's name, complete
16 address, and this case docket number must accompany each payment.

17 A copy of each check and the transmittal letter shall be
18 delivered or mailed to the Regional Hearing Clerk at the
19 following address:

20 U.S. Environmental Protection Agency
21 Region 10 Hearing Clerk
22 1200 Sixth Avenue, SO-125
23 Seattle, Washington 98101

24 20. Respondent's failure to comply with any provision
25 of this CACO shall render the entire unpaid portion of the
26 assessed penalty immediately due and payable, together with all
27 accrued interest. Such failure may also subject Respondent to a
28 civil action pursuant to TSCA Section 16(a)(4), 15 U.S.C.
29 § 2615(a)(4), to collect any unpaid portion of the assessed

1 penalty, together with interest, handling charges, and nonpayment
2 penalties as set forth in Paragraph 21 below. In any such
3 collection action, the validity, amount, and appropriateness of
4 the penalty is not subject to review.

5 21. Pursuant to 15 U.S.C. § 2615(a)(4) and 31 U.S.C.
6 § 3717, Respondent shall pay the following amounts:

7 a. Interest. Any unpaid portion of the assessed
8 penalty shall bear interest at the rate established by
9 the Secretary of the Treasury pursuant to 31 U.S.C.
10 § 3717(a)(1) from the date of entry of this CACO;
11 provided, however, that no interest shall be payable on
12 any portion of the assessed penalty that is paid within
13 30 days of the date a conformed copy of this CACO is
14 mailed to Respondent. In addition, no interest shall
15 be payable on any portion of the assessed penalty that
16 is suspended and deferred and is not subsequently
17 required to be paid.

18 b. Handling Charge. Pursuant to 31 U.S.C.
19 § 3717(e)(1), a monthly handling charge of \$15 shall be
20 paid if any portion of the assessed penalty is more
21 than 30 days past due.

22 c. Nonpayment Penalty. Pursuant to 31 U.S.C.
23 § 3717(e)(2), a nonpayment penalty of 6% per annum
24 shall be paid on any portion of the assessed penalty
25 that is more than 90 days past due, which nonpayment
26 penalty shall be calculated as of the day the


underlying penalty first becomes past due.

22. The provisions of this CACO shall be binding on Respondent, its officers, directors, employees, agents, servants, authorized representatives, successors, and assigns.

23. Each party shall bear its own costs, fees, and disbursements in this action.

24. This document is a "consent order" as that term is used in the Penalty Policy for the purposes of demonstrating a "history of prior such violations" as provided in Section 16 of TSCA, 15 U.S.C. § 2615.


DATED this 28 day of September, 1994.


for CHUCK CLARKE
Regional Administrator

Stipulated, Agreed, and
Approved for Entry,
Waiving Notice:


INLAND EMPIRE PAPER COMPANY

Dated: Sept 20, 1994


V.P. & Gen. MGR.

U.S. ENVIRONMENTAL PROTECTION AGENCY

Dated: Sept. 27, 1994


Lori L. Houck
Assistant Regional Counsel

1
2
3
4
5 Certificate of Service
6
7

8 I hereby certify that a copy of the foregoing Consent
9 Agreement and Consent Order for Payment of Civil Penalties in In
10 the Matter of: Inland Empire Paper Co., was mailed to Mr. Wayne
11 Andresin and the original was hand delivered to the Regional
12 Hearing Clerk at the following addresses:

13 Mr. Wayne Andresin
14 Vice President
15 Inland Empire Paper Company
16 North 332 Argonne Road
17 Spokane, Washington 99212

By Certified Mail
Return Receipt Requested

18 Ms. Mary Shillcutt
19 Regional Hearing Clerk
20 U.S. Environmental Protection
21 Agency
22 1200 Sixth Avenue
23 Seattle, Washington 98101

By Hand Delivery

24 Dated: September 28, 1994

Pamela R. Lewis
Pamela R. Lewis
Environmental Protection
Agency

1. Gordon
2. Constant
3. Tangaw
4. Julie Wazawa
5. Eubolay
6. Jan Alexa

OK OTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: SO-155

Wayne Andresin, Vice President
Inland Empire Paper Company
North 332 Argonne Road
Spokane, Washington 99212

Re: Proposed Consent Agreement and Consent Order for Payment of
Civil Penalties; Docket No. 1094-06-05-2615

Dear Mr. Andresin:

It was a pleasure to speak with you and Rick Fink by telephone concerning the resolution of this matter. In accordance with our discussion, I have enclosed a proposed Consent Agreement and Consent Order for your review.

As we also discussed, you will provide a cost estimate for disposal of PCB large capacitors in the amount of no less than \$4,250. Such estimate cannot include cost of labor provided by your company personnel, cost of replacement equipment, or the cost of cleanup of releases of PCB, if any.

If, after your review, the CACO is satisfactory, please have it signed and returned to me at the above-listed address. After we receive your cost estimate and everything is otherwise in order, we can have the Regional Administrator sign the CACO to finalize it.

If you have questions about the CACO, you can call me at (206) 553-1115. I will be out of the office until September 13, 1994, so feel free to discuss this matter with Bill Hedgebeth in my absence. Bill's telephone number is (206) 553-7369.

Sincerely,

Lori L. Houck (Mrs)

Lori L. Houck
Assistant Regional Counsel

Enclosure

cc: (w/enclosure)
Bill Hedgebeth, ATD

RECEIVED
SEP 09 1994

PESTICIDES & TOXIC SUBSTANCES
BRANCH-EPA REGION 10

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8 BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

9 In the Matter of:)
10 Inland Empire Paper Company) Docket No. 1094-06-05-2615
11 Respondent.)
12) CONSENT AGREEMENT AND CONSENT
13) ORDER FOR PAYMENT OF CIVIL
14) PENALTIES
15)

16 I. PRELIMINARY STATEMENT

17 1. The United States Environmental Protection Agency
18 ("EPA") initiated this proceeding for the assessment of civil
19 penalties pursuant to Section 16(a) of the Toxic Substances
20 Control Act ("TSCA"), 15 U.S.C. § 2615(a), by issuing a complaint
21 against Respondent, Inland Empire Paper Company ("Respondent"),
22 on July 18, 1994 ("Complaint").

23 2. The Complaint charged Respondent with violation of
24 the Polychlorinated Biphenyls ("PCB") regulations, 40 C.F.R. Part
25 761, in violation of TSCA Section 15, 15 U.S.C. § 2614, at its
26 facility in Spokane, Washington ("Facility"), and sought the
27 imposition of a \$5,000 penalty. The Complaint alleged a

1 violation of the notification requirements of 40 C.F.R.

2 § 761.202(b)

3 3. As a result of information exchanged during
4 settlement negotiations, EPA and Respondent have agreed to
5 resolve this matter by executing this Consent Agreement and
6 Consent Order ("CACO").

7
8 II. CONSENT AGREEMENT

9 4. Respondent admits the jurisdictional allegations
10 contained in the Complaint.

11 5. Respondent neither admits nor denies the factual
12 allegations, findings, or conclusions of law contained in the
13 Complaint.

14 6. Respondent took prompt action to come into
15 compliance with the PCB regulations and has shown a willingness
16 to settle this matter without further litigation. Accordingly,
17 in conformance with EPA's PCB Penalty Policy dated April 9, 1990,
18 ("Penalty Policy"), EPA agrees to reduce the proposed penalty of
19 \$5,000 by 15 percent, to \$4,250.

20 7. Respondent agrees to the assessment of this \$4,250
21 penalty.

22 8. Respondent has informed EPA that it will incur at
23 least \$4,250 in costs for the early removal and disposal of PCB
24 large capacitors by no later than the 1-year anniversary of the
25 entry of this CACO. Therefore, in accordance with the Penalty
26 Policy, EPA agrees that up to 50 percent of the assessed penalty

1 may be mitigated as set forth in the Consent Order below.

2 9. Respondent waives its right to request an
3 adjudicatory hearing on any issue addressed in this CACO.

4 10. Respondent agrees not to claim or attempt to claim
5 a federal income tax deduction or credit covering all or any part
6 of the civil penalty paid to the United States Treasurer.

7 11. Respondent represents that it is duly authorized
8 to execute this CACO and that the party signing this CACO on its
9 behalf is duly authorized to bind Respondent to the terms of this
10 CACO.

11 12. Respondent and EPA agree to issuance of the
12 Consent Order below.

13
14 III. CONSENT ORDER

15 IT IS HEREBY ORDERED and ADJUDGED as follows:

16 13. For the reasons set forth above, Respondent is
17 hereby assessed a penalty in the amount of \$4,250.

18 14. Respondent shall pay \$2,125 of the assessed
19 penalty no later than 30 days from the date of entry of the CACO.

20 15. The remaining \$2,125 of the assessed penalty is
21 suspended and deferred until the 1-year anniversary of the entry
22 of this CACO, at which time it shall be immediately due and
23 payable, together with all interest accrued thereon in accordance
24 with Paragraph 21 below, without further proceedings, notice, or
25 order, EXCEPT as provided in Paragraph 16 below.

26 16. Respondent shall be entitled to a credit against

1 the suspended and deferred portion of the assessed penalty if
2 Respondent complies with Paragraph 17 below, but only to the
3 extent such credit is allowed by EPA in accordance with
4 Paragraph 18 below. The maximum amount of such credit ("Maximum
5 Credit") shall be equal to one-half of the amount actually spent
6 by Respondent for the early removal and disposal of PCB
7 capacitors (as reflected in the affidavit referred to in
8 Paragraph 18 below), but not to exceed \$2,125.

9 17. On or before the 1-year anniversary of the entry
10 of this CACO, Respondent shall file with the Regional Hearing
11 Clerk an affidavit stating:

12 a. that PCB large capacitors have been removed
13 and disposed of in accordance with 40 C.F.R. § 761.60
14 and other applicable law;

15 b. the amount of actual removal and disposal expenses
16 incurred by Respondent in connection with the early removal
17 and disposal of the PCB large capacitors at the Facility
18 after the entry of this CACO (which amount shall not include
19 the cost of labor provided by Respondent, the cost of
20 replacement equipment, or the cost of cleanup of releases
21 from the PCB large capacitors);

22 c. that the PCB large capacitors referred to in
23 Subparagraphs a and b above have been disposed of in
24 accordance with 40 C.F.R. § 761.60 and other applicable
25 law;

d. that the PCB large capacitors referred to in Subparagraphs a and b above were not required to be removed by law or regulation; and

e. with respect to the disposal of any PCB large capacitors, that such PCB large capacitors were operable and serviceable at the time of disposal.

The affidavit shall be accompanied by appropriate documentation to verify the amount of such actual disposal expenditures (such as invoices and receipts) and the proper disposal of the PCB large capacitors (such as manifests and disposal certificates).

A copy of the affidavit and supporting documentation shall be sent to:

U.S. Environmental Protection Agency
Region 10 M/S AT-083
1200 Sixth Avenue
Seattle, Washington 98101
Attn: William Hedgebeth

18. No later than 30 days after the affidavit and documentation specified in Paragraph 17 have been filed, EPA shall file a statement setting forth the precise amount of any credit allowed by EPA and explaining the basis for the denial of any credit for expenditures requested by Respondent.

a. If EPA does not respond to Respondent's timely filing within such 30-day period, EPA shall be deemed to have waived, for civil purposes only, its right to make such a contention, and Respondent shall be entitled to the Maximum Credit.

1 b. If EPA files a statement in a timely manner
2 disputing the amount of expenditures claimed by Respondent,
3 Respondent shall be entitled only to such credit against the
4 suspended and deferred portion of the assessed penalty as
5 allowed by EPA in such statement, and the remainder of the
6 suspended and deferred portion shall become immediately due
7 and payable, with interest.

8 19. All payments under this CACO shall be made by
9 mailing a certified check or money order, payable to the United
10 States Treasurer, to:

11 U.S. Environmental Protection Agency
12 (Region 10 Hearing Clerk)
13 P.O. Box 360903M
 Pittsburgh, Pennsylvania 15251

14 A transmittal letter indicating Respondent's name, complete
15 address, and this case docket number must accompany each payment.

16 A copy of each check and the transmittal letter shall be
17 delivered or mailed to the Regional Hearing Clerk at the
18 following address:

19 U.S. Environmental Protection Agency
20 Region 10 Hearing Clerk
 1200 Sixth Avenue, SO-125
 Seattle, Washington 98101

21 20. Respondent's failure to comply with any provision
22 of this CACO shall render the entire unpaid portion of the
23 assessed penalty immediately due and payable, together with all
24 accrued interest. Such failure may also subject Respondent to a
25 civil action pursuant to TSCA Section 16(a)(4), 15 U.S.C.
26 § 2615(a)(4), to collect any unpaid portion of the assessed

1 penalty, together with interest, handling charges, and nonpayment
2 penalties as set forth in Paragraph 21 below. In any such
3 collection action, the validity, amount, and appropriateness of
4 the penalty is not subject to review.

5 21. Pursuant to 15 U.S.C. § 2615(a)(4) and 31 U.S.C.
6 § 3717, Respondent shall pay the following amounts:

7 a. Interest. Any unpaid portion of the assessed
8 penalty shall bear interest at the rate established by
9 the Secretary of the Treasury pursuant to 31 U.S.C.
10 § 3717(a)(1) from the date of entry of this CACO;
11 provided, however, that no interest shall be payable on
12 any portion of the assessed penalty that is paid within
13 30 days of the date a conformed copy of this CACO is
14 mailed to Respondent. In addition, no interest shall
15 be payable on any portion of the assessed penalty that
16 is suspended and deferred and is not subsequently
17 required to be paid.

18 b. Handling Charge. Pursuant to 31 U.S.C.
19 § 3717(e)(1), a monthly handling charge of \$15 shall be
20 paid if any portion of the assessed penalty is more
21 than 30 days past due.

22 c. Nonpayment Penalty. Pursuant to 31 U.S.C.
23 § 3717(e)(2), a nonpayment penalty of 6% per annum
24 shall be paid on any portion of the assessed penalty
25 that is more than 90 days past due, which nonpayment
26 penalty shall be calculated as of the day the

underlying penalty first becomes past due.

22. The provisions of this CACO shall be binding on Respondent, its officers, directors, employees, agents, servants, authorized representatives, successors, and assigns.

23. Each party shall bear its own costs, fees, and disbursements in this action.

24. This document is a "consent order" as that term is used in the Penalty Policy for the purposes of demonstrating a "history of prior such violations" as provided in Section 16 of TSCA, 15 U.S.C. § 2615.

DATED this ____ day of _____, 1994.

CHUCK CLARKE
Regional Administrator

Stipulated, Agreed, and
Approved for Entry,
Waiving Notice:

INLAND EMPIRE PAPER COMPANY

Dated: _____

U.S. ENVIRONMENTAL PROTECTION AGENCY

Dated: _____

Lori L. Houck
Assistant Regional Counsel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED

94 SEP -1 AM 10:18

SEP 01 1994

HEARINGS CLERK
EPA--REGION 10

Reply To
Attn Of: S0-155

Mr. Wayne Andresin
Vice President
Inland Empire Paper Company
North 332 Argonne Road
Spokane, Washington 99212

Re: In the Matter of: Inland Empire Paper Co.,
Docket No. 1094-06-05-2615

Dear Mr. Andresin:

Enclosed is a Motion, Stipulation, and Order for Extension of Time to File Answer in the above referenced matter. The new deadline for filing the answer is September 30, 1994.

Please call me at (206) 553-1115 if you have any questions.

Sincerely,

Lori L. Houck

Lori Houck
Assistant Regional Counsel

Enclosures

RECEIVED

SEP 02 1994

PESTICIDES & TOXIC SUBSTANCES
BRANCH-EPA REGION 10

RECEIVED

94 SEP -1 AM 10:18

HEARINGS CLERK
EPA--REGION 10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE REGIONAL ADMINISTRATOR
Region 10
Seattle, Washington

IN THE MATTER OF:

INLAND EMPIRE PAPER COMPANY,

Respondent.

Docket No. 1094-06-05-2615

MOTION, STIPULATION, AND ORDER
FOR EXTENSION OF TIME TO
FILE ANSWER

MOTION AND STIPULATION

The Parties in the above-entitled matter jointly request and stipulate that the time for Respondent to file an answer be extended in order to allow the Parties sufficient time to attempt to resolve the matter.

Dated: 9/1/94

Wayne Andresen
FOR RESPONDENT *per request HDT*

Dated: 9/1/94

Lori L. Haweck
FOR EPA

1 ORDER

2 In accordance with 40 C.F.R. §§ 22.07(b) and 22.16(c)
3 and pursuant to the Parties' approval by the signature(s) affixed
4 above, the time for Respondent to file an answer is extended to
5 the close of business on the 30th day of September, 1994.

6
7 Dated: 9/1/94

CHUCK CLARKE
REGIONAL ADMINISTRATOR

8
9
10 Mary A. Shultz
11 By Direction
Hearing Clerk, EPA Region 10
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5 Certificate of Service
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8 I hereby certify that a copy of the foregoing Motion,
9 Stipulation, and Order for Extension of Time to File Answer in In
10 the Matter of: Inland Empire Paper Co., was mailed to Mr. Wayne
11 Andresin and the original was hand delivered to the Regional
12 Hearing Clerk at the following addresses:

13 Mr. Wayne Andresin
14 Vice President By Regular Mail
15 Inland Empire Paper Company
16 North 332 Argonne Road
Spokane, Washington 99212

17 Ms. Mary Shillcutt
18 Regional Hearing Clerk By Hand Delivery
19 U.S. Environmental Protection
Agency
1200 Sixth Avenue
Seattle, Washington 98101

20 Dated: Sept 01, 1994
21

Pamela R. Lewis
Pamela R. Lewis
Environmental Protection
Agency
22
23
24
25
26
27
28

Inland Empire Paper Co.

8-31-94
2pm

EPA

- Lou Hawk / ORC
- Anne Robinson
- Ben Hedgcock

Inland

- Wayne Anderson (VP and General Manager)
- Rick Pankas Corp.

Lou made introductory comments

- rec'd / reviewed Aug 25 letter

Wayne - recognize violation exists

- admits to pay^{not} an issue (~~not~~)

Ben -

offer
assessed

$$\begin{array}{r} \$5,000 \\ -15\% \quad -750 \\ \hline 4250 \\ - \$2125 \\ \hline \end{array}$$

cash

\$2125 mitigated

to early dispose of PCB large capacitors

explained
only actual
disposal
costs merit
credit

Wayne - can get new GTE estimate

Lou - extension to Sept. 30 - can
send draft CACO

Wayne



INLAND EMPIRE PAPER COMPANY

N. 3320 ARGONNE
SPOKANE, WASHINGTON 99212-2099

RECEIVED
AUG 26 1994

PHONE 509/924-1911

FAX 509/927-8461

OFFICE OF REGIONAL COUNSEL
EPA - REGION X

August 25, 1994

Ms. Lori L. Houck
Assistant Regional Counsel
U.S. Environmental Protection Agency
1200 Sixth Avenue, SO-155
Seattle, WA 98101

RECEIVED
AUG 29 1994
PESTICIDES & TOXIC SUBSTANCE
BRANCH - EPA REGION 10

RE: TSCA Docket NO. 1094-06-05-2615

Dear Ms. Houck:

This letter is in response to the civil penalty assessed against Inland Empire Paper Company (IEP) for failure to notify and request an EPA identification number concerning one instance of temporary storage of a non-leaking transformer containing a small amount of PCB's.

Inland Empire Paper Company is the smallest privately held newsprint manufacturer in North America. It has a production capacity of 225 TPD and employs 117 full-time workers. This mill is a steward of the environment. It has installed, on its own initiative, a recycling process for old newspapers and a state-of-the-art wastewater treatment plant. The wastewood from the local sawmills is used as the chip supply for the refiner groundwood. At a substantial expense, the mill has replaced all of its PCB transformers to become environmentally safe. Even though the economy of the last couple of years has been very depressed for the paper industry, IEP has maintained its competitiveness and runs an environmentally sound operation by being innovative and keeping a low overhead. This mill is too small to support a full-time environmental manager who would keep abreast of the frequent changes in the Federal Register. Nevertheless, the company attempts to keep track of changes by reviewing informational fact sheets and attending workshops sponsored by the environmental agencies and trade organizations to stay in compliance with the ever changing environmental regulations on the local, state, and federal levels.

IEP is protesting the proposed \$5000 civil penalty. The complaint against IEP is based on failure to request an EPA identification number, a requirement promulgated by 40CFR761.202 on June 4, 1990.

Inland Empire Paper Company

Regional Hearing Clerk

Page 2

August 25, 1994

If IEP had followed the same storage and disposal practice prior to June 4, 1994, there would have been no violation. IEP was not aware of the requirement for an EPA identification number. The new regulations went into effect on June 4, 1990, and IEP placed a PCB transformer into storage for disposal on September 13, 1990. The transformer was not leaking, was taken out of service in good faith, and was properly stored until shipped for disposal on May 7, 1994. IEP did not commit a criminal act to circumvent disposal costs. The failure to request an EPA identification number for PCB container storage and disposal was the result of poor dissemination of rule changes to the Toxic Substance Control Act (TSCA). Small companies need updated informational fact sheets from the environmental agencies that will allow them to stay in compliance with the constant flux of regulations.

The proposed \$5000 fine assessed is also punitive in nature. This was not a flagrant violation. It was not done to shirk a disposal cost. The violation came about due to a lack of information pertaining to the requirements of the new TSCA regulations. IEP has an excellent record in phasing out its PCB transformers and adhering to the TSCA. We therefore request that you reconsider the severity of the civil penalty assessed against IEP, keeping in mind the company size, its lack of intent to violate, and its unblemished record concerning environmental violations.

After having conferred with the Office of Regional Counsel, Region 10, there does exist a possibility to negotiate a penalty adjustment. The route to negotiation is tied to IEP's willingness to do something environmentally beneficial, i.e., agree to remove and dispose of some of its 29 capacitors containing PCB. The EPA has proposed that the fine could be reduced by \$1 for every \$2 spent, up to a maximum of 50 percent reduction for monies spent for PCB replacement. In addition, the EPA would allow a 15 percent credit for IEP's willingness to resolve the civil penalty. A quote from General Electric (dated August 25, 1994) is attached for the removal of four currently operating PCB capacitors at a cost of \$5027. As we were led to understand, this is the monies that IEP would have to spend to reduce the fine to the maximum reduction allowed by the EPA. This would still leave IEP with a notice of violation, a fine, and a blemish on its stellar reputation in the community. This is not an equitable solution for IEP and it would not remove all the PCB's at the facility.

IEP proposes that, rather than follow the EPA's position, it schedule a complete PCB capacitor removal if the EPA would, in turn, drop its notice of violation. IEP would spend \$24,211 quoted by General Electric (see attached quote dated August 3, 1994) for

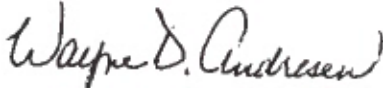
Inland Empire Paper Company

Regional Hearing Clerk
Page 3
August 25, 1994

replacing all remaining 29 PCB capacitors. This would truly protect the environment and keep with the spirit of the EPA, as well as not blemish IEP's prior exemplary environmental record. Last but not least, we need to maintain the confidence of the public sector in this climate where general criticism of the pulp and paper industry is prevalent. The notice of violation, under the facts of this case, is counterproductive for our image and that of the pulp and paper industry. Inland Empire Paper Company urges you to consider our proposal.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, reading "Wayne D. Andresen".

Wayne D. Andresen
Vice President and
General Manager

mb



GE Industry Sales & Services
Quotation for Services

GEISS FORM 487(Q)

QUOTATION NO. 437P1007 (alternate)

DATE August 25, 1994

NOTICE: This quotation is void unless accepted within 30 days date hereof and is subject to change upon notice. However, if GE elects to perform the services covered by the quotation in response to an order placed 30 or more days after the date of the quotation, the terms of the quotation will apply.

TO Mr. Mike Reynolds

Inland Empire Paper Co.

N. 3320 Argonne Road

Spokane, WA 99206

Type of Service

- ☐ Installation/Repair/Maintenance
- ☐ Field Engineering Service
- ☐ Job Management Service
- ☐ Training Service
- ☐ Engineering Study/Inspection/Test
- ☒ PCB Service

Work Description, Completion, Price- GE Industry Sales and Services (GE) agrees as follows:

General Electric Installation & Service Engineering is pleased to submit this alternate proposal to our original proposal #437P1007 dated 8/3/94. This alternate proposal reduces the number of capacitors to be disposed of to (4) existing PCB capacitors and supplies (4) replacement capacitors for the capacitor bank located on your 4160V system.

GE will supply a box or drum(s) for loading the old non-leaking capacitors into, dispose of the PCB capacitors at an EPA approved incinerator of GE's choice, and supply new capacitors delivered to IEP.

IEP will provide necessary manpower to remove the PCB capacitors and load them into the provided box(es) or drum(s) and load them onto the GE truck. IEP will also install the new capacitors and will be responsible for any modifications to the rack assembly for mounting the new capacitors.

With the exception of capacitor quantities and pricing, all other terms, conditions, and requirements of the previous proposal 437P1007 will apply.

Lump Sum Price \$ 5,027.00

This Quotation is for a contract to be performed by GE Industry Sales and Services and is subject to the Conditions of Sale, GEISS Forms 487(CS), and 487(PCB) attached.

GENERAL ELECTRIC COMPANY (GE)

By Richard N. Duval
Title Field Engineer
Address E. 12720 Nora, Suite E
Spokane, WA 99216
509-891-1511, 800-533-5885



GE Industry Sales & Services

Quotation for Services

GEISS Form 487(Q)

QUOTATION NO. 437P1007DATE 8/3/94

NOTICE: This quotation is void unless accepted within 30 days from date hereof and is subject to change upon notice. However, if GE elects to perform the services covered by the quotation in response to an order placed 30 or more days after the date of the quotation, the terms of the quotation will apply.

To Mr. Mike ReynoldsAddress Inland Empire Paper CompanyN. 3320 Argonne RoadSpokane, Washington 99206

Type of Service

- ☐ Installation/Repair/Maintenance
- ☐ Field Engineering Service
- ☐ Job Management Service
- ☐ Training Service
- ☐ Engineering Study/Inspection/Test
- ☒ PCB Service

Work Description, Completion, Price - GE Industry Sales & Services (GE) agrees as follows:

General Electric Installation and Service Engineering is pleased to submit this proposal to dispose of (30) existing PCB capacitors and to supply (30) replacement capacitors for the capacitor bank located on your 4160V system

GE will supply a box for loading the old non-leaking capacitors into, dispose of the PCB capacitors at an EPA approved incinerator of GE's choice, and new capacitors delivered to IEP.

IEP will provide necessary manpower to remove the PCB capacitors and load them into the provided box(s) and load them onto the GE truck. IEP will also install the new capacitors and will be responsible for any modification to the rack assembly for mounting the new capacitors.

With the exception of pricing, this proposal is the same as GE's proposal of 7/17/89, FSR437P0430.

Lump Sum Price \$24,211.00.

This Quotation is for a contract to be performed by GE Industry Sales and Services and is subject to the Conditions of Sale, GEISS Form 487(CS), attached.

GENERAL ELECTRIC COMPANY (GE)

By Ed SchaeferTitle AREA ENGINEERAddress E. 12720 Nora Ave.SPOKANE, WA 99216



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

August 9, 1994

Reply To
Attn Of: SO-155

Mr. Wayne Andresin
Inland Empire Paper Company
North 332 Argonne Road
Spokane, Washington 99212

Re: In the Matter of: Inland Empire Paper Co.,
Docket No. 1094-06-05-2615

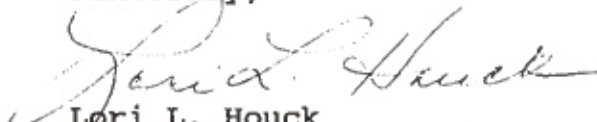
Dear Mr. Andresin:

I am writing to confirm our telephone conversation on August 4, 1994. In our call it was agreed that, by August 29, 1994, Inland Empire Paper Company will submit to the U.S. Environmental Protection Agency (EPA) a proposal for a supplemental environmental project related to early disposal of PCB capacitors. By August 29, Inland Empire will also submit any other information it wishes EPA to consider for a reduction in the penalty assessed in this matter.

As we also discussed, we will have a telephone conference call on August 31, 1994 to discuss the information and proposal provided by Inland Empire. We did not, however, set a specific time for the conference call. I propose that EPA call your office at 2:00 p.m. on August 31, 1994. We will call your telephone number (509) 924-1911 unless you contact us with another number. EPA participants on the conference call will be William Hedgebeth, Anne Robinson, and myself.

Thank you for your cooperation. We look forward to receiving your information and resolving this matter in a timely manner.

Sincerely,


Lori L. Houck
Assistant Regional Counsel

cc: William Hedgebeth
Rick Fink

RECEIVED

AUG 10 1994

PESTICIDES & TOXIC SUBSTANCES
BRANCH-EPA REGION 10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue
Seattle, Washington 98101

AUG 04 1994

HEARINGS CLERK
EPA--REGION 10

Reply To
Attn Of: S0-155

Mr. Wayne Andresin
Vice President
Inland Empire Paper Company
North 332 Argonne Road
Spokane, Washington 99212

Re: In the Matter of: Inland Empire Paper Co.,
Docket No. 1094-06-05-2615

Dear Mr. Andresin:

Enclosed is a Motion, Stipulation, and Order for Extension of Time to File Answer in the above referenced matter. The new deadline for filing the answer is September 15, 1994.

Please call me at (206) 553-1115 if you have any questions.

Sincerely,


Lori Houck
Assistant Regional Counsel

Enclosures

RECEIVED

AUG 8 1994

PESTICIDES & TOXIC SUBSTANCES
BRANCH-EPA REGION 10

RECEIVED

94 AUG -4 PM 3:56

HEARINGS CLERK
EPA--REGION 10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE REGIONAL ADMINISTRATOR
Region 10
Seattle, Washington

IN THE MATTER OF:

INLAND EMPIRE PAPER COMPANY,

Respondent.

Docket No. 1094-06-05-2615

MOTION, STIPULATION, AND ORDER
FOR EXTENSION OF TIME TO
FILE ANSWER

MOTION AND STIPULATION

The Parties in the above-entitled matter jointly
request and stipulate that the time for Respondent to file an
answer be extended in order to allow the Parties sufficient time
to attempt to resolve the matter.

Dated: 8/4/94

Wayne Andresin
FOR RESPONDENT *per request of Hawk*

Dated: 8/4/94

Lori L. Hawk
FOR EPA

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Dated: 2/4/94

By Direction
Hearing Clerk, EPA Region 10

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5 Certificate of Service
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7

8 I hereby certify that a copy of the foregoing Motion,
9 Stipulation, and Order for Extension of Time to File Answer in In
10 the Matter of: Inland Empire Paper Co., was mailed to Mr. Wayne
11 Andresin and the original was hand delivered to the Regional
12 Hearing Clerk at the following addresses:

13 Mr. Wayne Andresin
14 Vice President By Regular Mail
15 Inland Empire Paper Company
16 North 332 Argonne Road
Spokane, Washington 99212

17 Ms. Mary Shillcutt
18 Regional Hearing Clerk By Hand Delivery
19 U.S. Environmental Protection
Agency
1200 Sixth Avenue
Seattle, Washington 98101

20 Dated: August 4, 1994

21 Pamela R. Lewis
22 Pamela R. Lewis
23 Environmental Protection
24 Agency
25
26
27
28



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply to the
Attention of M/S SO-155

JULY 18, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Citizens Realty Company
Registered Agent for
Inland Empire Paper Company
Review Tower, Room 626
W. 999 Riverside Avenue
Spokane, WA 99201

Re: Inland Empire Paper Company
Toxic Substances Control Act
Docket No. 1094-06-05-2615

Dear Registered Agent:

Enclosed is an administrative complaint for the assessment of civil penalties that has been filed against Inland Empire Paper Company, N. 3320 Argonne Road, Spokane, Washington (Respondent) by the Environmental Protection Agency (EPA). A copy of the penalty policy and the Consolidated Rules of Practice that apply to this complaint are also enclosed.

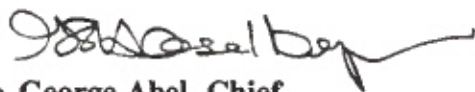
The complaint alleges that Respondent violated the Notification provisions of the PCB (polychlorinated biphenyl) Regulations issued under the Toxic Substances Control Act (TSCA). As explained in the complaint, unless Respondent requests and receives a written extension of time, it has 20 days to do one of the following:

1. arrange a settlement conference and request and receive a written extension of time;
2. file a written answer and request a hearing with an administrative law judge;
or
3. pay the proposed penalty.

The specific procedures for each of the three options are explained in the complaint. Also, as explained in the complaint, if Respondent fails to take one of the actions outlined above, a default order could be entered against it. After entry of an order of default, penalties can be assessed without further notice.

However, we are available to discuss with Respondent the alleged violations and proposed penalties. Such discussions may result in settlement which would make the filing of a written answer unnecessary. Lori L. Houck, Assistant Regional Counsel, is the attorney handling this complaint for EPA. If Respondent wants to arrange for a settlement conference, request a time extension, or has any questions, Ms. Houck may be reached at (206) 553-1115.

Sincerely,


For George Abel, Chief
Pesticides and Toxic Substances Branch

cc: Rebecca Torchia, EPA Headquarters

Enclosures

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10 **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

11 In the Matter of:)
12 INLAND EMPIRE PAPER COMPANY,)
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14 Respondent.)
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DOCKET NO. 1094-06-05-2615

COMPLAINT

I. BACKGROUND

1. This is an administrative action instituted pursuant to Section 16(a) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2615(a), for the assessment of a civil penalty. The Complainant is Region 10, United States Environmental Protection Agency (EPA), which has been delegated the authority to institute this action.

2. Complainant alleges that the above-named Respondent violated Section 15 of TSCA, 15 U.S.C. § 2614, by violating the regulations at 40 C.F.R. Part 761, which were promulgated pursuant to Section 6 of TSCA, 15 U.S.C. § 2605, and pertain to the use and disposal of polychlorinated biphenyls ("PCBs").

3. On February 3, 1994, an EPA inspection was performed at Inland

1 Empire Paper Company, N. 3320 Argonne Road, Spokane, Washington. The purpose of
2 the inspection was to determine compliance with TSCA, 15 U.S.C. § 2601 et seq., and
3 specifically the PCB regulations promulgated at 40 C.F.R. Part 761. A violation was
4 documented as a result of the inspection; this violation is described below.

5 6 II. VIOLATION

7
8 4. Respondent placed a GE transformer, serial number 5928557, into
9 storage for disposal on September 13, 1990.

10 5. The transformer identified in Paragraph 4 was PCB-Contaminated
11 Electrical Equipment as defined at 40 C.F.R. §761.3, containing 341 parts per million
12 PCB.

13 6. On May 7, 1991, Respondent manifested the transformer identified in
14 Paragraph 4 to Aptus, Inc., on Uniform Hazardous Waste Manifest Number AZ02I.

15 7. The transformer identified in Paragraph 4 contained approximately two
16 gallons of dielectric fluid.

17 8. Respondent placed a PCB Container, as defined by 40 C.F.R. §761.3,
18 containing approximately five gallons of dielectric fluid into storage for disposal on
19 September 13, 1990.

20 9. The liquid in the PCB Container identified in Paragraph 8 contained
21 140 parts per million PCB.

22 10. On May 7, 1991, Respondent manifested the PCB Container identified
23 in Paragraph 8 to Aptus, Inc., on Uniform Hazardous Waste Manifest number AZ02I.

24 11. The PCB-contaminated transformer identified in Paragraph 4 and the
25 PCB Container identified in Paragraph 8 were "PCB wastes" as defined at 40 C.F.R.
26 §761.3.

1 12. 40 C.F.R. §761.3 defines "EPA identification number" as the 12-digit
2 number assigned to a facility by EPA upon notification of PCB waste activity under
3 40 C.F.R. §761.205.

4 13. During the time Respondent stored for disposal the PCB wastes
5 identified in Paragraphs 4 and 8, Respondent had not notified EPA pursuant to
6 40 C.F.R. §761.205(c)(2)(ii) identifying the area where the PCB wastes were stored, and,
7 therefore, had not received an EPA identification number from EPA.

8 14. The area where Respondent stored the PCB wastes identified in
9 Paragraphs 4 and 8, prior to manifesting to Aptus, Inc., for disposal, was subject to the
10 storage for disposal requirements of 40 C.F.R. §761.65(b) from October 13, 1990, until
11 May 7, 1991.

12 15. Respondent was not exempt from the notification requirements of
13 40 C.F.R. §761.205(c)(2).

14 16. REGULATION - EPA IDENTIFICATION NUMBERS:
15 40 C.F.R. §761.202(b) states, in part, that after June 4, 1990, a generator of PCB waste
16 shall not store PCB waste without having received an EPA identification number from
17 the agency.

18 17. COUNT: Respondent stored PCB wastes identified in Paragraphs 4
19 and 8 without having received an EPA identification number from EPA.

III. PROPOSED CIVIL PENALTY

18. Section 16 of TSCA, 15 U.S.C. § 2615, authorizes a civil penalty of up to \$25,000.00 per day for each violation of TSCA. Based upon the violation cited in this Complaint, the nature, circumstances, extent, and gravity of the violation alleged, Respondent's ability to pay, effect on the Respondent's ability to continue to do business, the degree of Respondent's culpability, and such other matters as justice requires, the Complainant proposes that Respondent be assessed the following penalty calculated in accordance with the PCB Penalty Policy. A copy of the PCB Penalty Policy accompanies this Complaint.

19. The nature, circumstances, and gravity of Respondent's failure to notify EPA prior to storing regulated PCB waste, as cited in the Count, are represented by Level One on the matrix in the Penalty Policy.

20. The extent of this violation is represented by "minor" on the matrix.

21. The proposed penalty reflects a presumption of Respondent's ability to pay the penalty and to continue in business. Respondent may submit appropriate documentation to rebut that presumption during settlement negotiations. Taking into account all the above factors, the penalty for Respondent, Inland Empire Paper Company, as prescribed by the matrix, is \$5,000, calculated as set forth below.

<u>Regulation</u>	<u>Requirement</u>	<u>Penalty Amount</u>
40 C.F.R. §761.202(b)	Notification	\$5,000

22. Based on the degree of culpability of Respondent, and such other matters as justice requires, no adjustment of the penalty is indicated at this time. If appropriate, penalty adjustments may be made during settlement negotiations.

1 **IV. NOTICE OF OPPORTUNITY TO REQUEST A HEARING**

2
3 23. The Consolidated Rules of Practice, 40 C.F.R. Part 22, govern these
4 proceedings. A copy of the Consolidated Rules of Practice accompanies this Complaint.
5 Under those rules, Respondent has the right to request a formal hearing to contest any
6 material fact set forth in this Complaint or to contest the appropriateness of the
7 proposed penalty.

8 24. To avoid being found in default, which constitutes an admission of all
9 material facts alleged in the Complaint and a waiver of the right to a hearing, and
10 which will effect the assessment of the above civil penalty without further proceedings,
11 Respondent must file with the Regional Hearing Clerk a written Answer within twenty
12 (20) days after receiving this Complaint. Respondent's Answer must clearly and directly
13 admit, deny, or explain each of the factual allegations contained in this Complaint with
14 regard to which Respondent has any knowledge. Where Respondent has no knowledge
15 of a particular fact and so states, the allegation is deemed denied. Failure to deny any
16 material factual allegation constitutes an admission of the allegation. The Answer shall
17 also state: (1) the circumstances or arguments which are alleged to constitute the
18 grounds of defense; (2) the facts which Respondent intends to place at issue; and
19 (3) whether a hearing is requested. A hearing is deemed requested should Respondent
20 contest any material fact upon which the Complaint is based or raise any affirmative
21 defense, or contend that the amount of the penalty proposed in the Complaint is
22 inappropriate, or claim that Respondent is entitled to judgment as a matter of law. The
23 Answer must be sent to:

24
25 Regional Hearing Clerk, Region 10
26 U.S. Environmental Protection Agency
27 1200 Sixth Avenue, SO-155
28 Seattle, Washington 98101

1 25. A copy of the Answer and all other documents which Respondent files in
2 this action must be furnished to Lori L. Houck, Assistant Regional Counsel, the attorney
3 assigned to represent EPA in this matter, at:
4

5 Office of Regional Counsel, Region 10
6 U.S. Environmental Protection Agency
7 1200 Sixth Avenue, SO-155
8 Seattle, Washington 98101

9 **V. INFORMAL SETTLEMENT CONFERENCE**
10

11 26. Whether or not a hearing is requested, Respondent may contact the
12 above-named attorney to arrange for an informal settlement conference to discuss the
13 facts of this case, the amount of the proposed penalty, or the possibility of settlement.
14 An informal settlement conference does not, however, affect Respondent's obligation to
15 file a timely written Answer (which is due within 20 days of receipt of this Complaint,
16 unless EPA and Respondent agree to a later date).

17 27. EPA has the authority to modify the amount of the proposed penalty,
18 where appropriate, to reflect any settlement reached with Respondent in an informal
19 conference. The terms of such an agreement would be embodied in a Consent
20 Agreement and Consent Order. A Consent Agreement and Consent Order entered into
21 by and between EPA and Respondent would be binding as to all terms and conditions
22 specified therein upon signature by the EPA Regional Administrator.

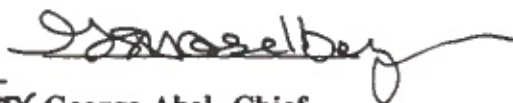
23 28. Respondent is advised that, after the Complaint is issued, the
24 Consolidated Rules of Practice prohibit any ex parte (unilateral) discussion of the
25 merits of these or any other factually related proceedings with the EPA Regional
26
27

1 Administrator, Administrative Law Judge, any member of the Environmental Appeals
2 Board, or any person likely to advise these officials in the decision of this case.

3
4
5 VI. PAYMENT OF PENALTY
6

7 29. Instead of requesting an informal settlement conference or filing an
8 Answer requesting a hearing, Respondent may choose to pay the proposed penalty. In
9 order to do this, Respondent must first establish contact with the EPA attorney named
10 in Section IV of this Complaint to arrange for the preparation of a Consent Agreement
11 and Consent Order.
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14

15 ISSUED AT SEATTLE this 15th day of July, 1994.
16

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19 
20 for George Abel, Chief

21 Pesticides and Toxic Substances Branch
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CERTIFICATE OF SERVICE

I hereby certify that the original and one copy of the foregoing Complaint, Docket Number 1094-06-05-2615, has been filed with the Region 10 Hearing Clerk, and that a true and correct copy (with accompanying copies of the Consolidated Rules of Practice and the Polychlorinated Biphenyls (PCB) Penalty Policy) was sent by Certified Mail, Return Receipt Requested, to:

Citizens Realty Company
Registered Agent for
Inland Empire Paper Company
N. 3320 Argonne Road
Spokane, WA 99212

7-18-94
DATE

[Signature]
NAME

Administrative Assistant
TITLE

DOCKET No. 1094-06-05-2615

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address

2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Citizens Realty Company
Registered Agent for
Inland Empire Paper Company
Review Tower, Room 626
W. 999 Riverside Avenue
Spokane, WA 99201

4a. Article Number

2 005 783 737

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

7/20/64

5. Signature (Addressee)

6. Signature (Agent)

M Kolthuk

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991

U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE

Official Business

RECEIVED

JUL 22 1994

PESTICIDES & TOXIC SUBSTANCES
BRANCH-EPA REGION 10

BH

U.S. EPA - REGION 10
PESTICIDES & TOXIC SUB. BR.
1200 - 6TH AVENUE (AT-083)
SEATTLE WA 98101



PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



Print your name, address and ZIP Code here





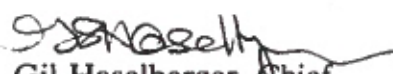
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

MAY 27 1994

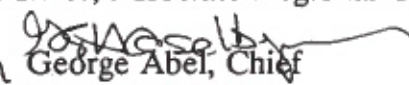
Reply to the
Attention of M/S AT-083

MEMORANDUM

SUBJECT: TSCA Referral for Administrative Civil Penalty:
Inland Empire Paper Company, Spokane, Washington

FROM: 
Gil Haselberger, Chief
Toxic Substances Section

TO: Margaret B. Silver, Associate Regional Counsel

THRU: 
George Abel, Chief
Pesticides and Toxic Substances Branch

On February 3, 1994, an EPA inspection was performed by Daniel R. Tangarone at Inland Empire Paper Company, N. 3320 Argonne Road, Spokane, Washington. The inspection was carried out to assess compliance with the PCB Regulations adopted by EPA pursuant to the Toxic Substances Control Act (TSCA).

As a result of reviewing the facility's documentation, a violation of the regulations was documented. This violation and associated regulations and requirements are set forth below and in the attached proposed civil complaint.

REGULATION - PCB WASTE DISPOSAL RECORDS AND REPORTS

40 C.F.R. §761.202(b) states, in part, that after June 4, 1990, a generator of PCB waste shall not store PCB waste without having received an EPA identification number from the agency. A generator of PCB waste who is exempted from notification under §761.205(c)(1) or who notifies EPA in a timely manner under §761.205(c)(2)(i), but has not yet received a unique identification number, shall be regarded as having received from EPA the identification number "40 CFR PART 761".

COUNT ONE

The facility stored a PCB-Contaminated Transformer (341 ppm PCB) and a 5-gallon bucket (140 ppm PCB), for longer than thirty days without filing EPA Form 7710-53 and receiving an EPA identification number.

Compliance History

12/15/83 PCB Inspection

7/17/84 Notice of Noncompliance: Storage and Marking

4/20/89 PCB Inspection

7/5/89 Notice of Noncompliance: Recordkeeping

Request for Action

This assessment is being referred to you for consideration of enforcement action. An Administrative Civil Penalty appears to be in order because of the significance of the violation. Following is a Civil Penalty Assessment for the documented violation of TSCA.

Description of Current Alleged Violation

Violation -	Failure to notify EPA as generator with on-site storage facility
Level -	One
Extent -	Minor, Non-Disposal (1 Transformer with approximately 2 gallons, 341 ppm PCB; 1 Container with approximately 5 gallons, 140 ppm PCB)
Penalty -	\$5,000

The TSCA Case Reviewer assigned to this case is William Hedgebeth, 3-7369.

Attachment

Mag - They still have quite a few PCB capacitors in use. This looks like a good opportunity to get an early disposal SEP worked into the CACO

- Jsil

CONCURRENCE SHEET

(ROBINSON):(INLAND REFERRAL PKG):(4/20/94):(DISK #2\INLAND\REFPKG)

bcc:

Haselberger
Rebecca Torchia, EPA HQ, EN-342
Robinson
Firm File

	ROBINSON	HEDGEBETH
INITIALS	<i>Rmc</i>	<i>U</i>
DATE	<i>5/10/94</i>	<i>5/10/94</i>

VIOLATION ASSESSMENT - EPA REGION 10

Anne Robinson
NAME AND TITLE OF EVALUATOR

PROGRAM: TSCA (PCB)

FACILITY NAME AND ADDRESS

**Inland Empire Paper Company
N. 3320 Argonne Road
Spokane, Washington 98212**

ACTION TAKEN

	NO VIOLATIONS/CLOSURE
	NO VIOLATIONS/ADVISORY
	NOTICE OF NONCOMPLIANCE
	FEDERAL FACILITY: NOTICE OF SIGNIFICANT NONCOMPLIANCE
X	REFERRAL: ADMINISTRATIVE CIVIL PENALTY
	REFERRAL: FEDERAL COMPLAINT
	OTHER

February 3, 1994
DATE OF INSPECTION

Daniel R. Tangarone
NAME OF INSPECTOR

COMMENTS

The Inland Empire Paper Company occupies several brick buildings along the Spokane River. It is a large mechanical mill, not a kraft process mill. Buys wood chips and processes them to newsprint by mechanical means. Owned by Spokesman-Review Newspaper. Routine output: 200 tons/day.

COMPLIANCE HISTORY

12/15/83 PCB Inspection
7/17/84 Notice of Noncompliance: Storage and Marking

4/20/89 PCB Inspection
7/5/89 Notice of Noncompliance: Recordkeeping

ANNUAL DOCUMENT (OR ANNUAL DOCUMENT LOG) ASSESSMENT

No PCB transformers. All transformers are <50 ppm PCB since 1984 (except for one identified in 1990 - see Notification),
One small PCB-Contaminated transformer found in 1990, disposed of in 1991. Fewer than 50 capacitors on site.

No necessity to produce Annual Document Log.

QUARTERLY (OR ANNUAL) INSPECTION/RECORD ASSESSMENT

No necessity to keep quarterly inspection records. No PCB transformers on site.

NOTIFICATION AND MANIFESTING ASSESSMENT

NOTIFICATION

9/13/90 GE Transformer 5928557 341 ppm PCB declared surplus 9/13/90 ,
Manifested out 5/7/91 - kept on site for longer than 30 days. A PCB Container containing approximately 5 gallons of oil with 140 ppm PCB was also stored for disposal during the same period.

Violation:

Facility did not notify as a generator of PCB waste prior to storage of above-referenced transformer and container. The area was subject to the §761.65(b) storage requirements since facility stored it longer than 30 days.

MANIFESTING

Review of documents does not indicate any manifesting violations.

OTHER REGULATORY ASSESSMENT

Facility is using 40 CFR Part 761 as EPA generator number. Has not notified as generator with on-site storage facility.

PENALTY CALCULATION

Description of Current Alleged Violation

Violation -	Failure to notify EPA as generator with on-site storage facility
Level -	One
Extent -	Minor, Non-Disposal (168 kg - per Uniform Hazardous Waste Manifest §19)
Penalty -	\$5,000

RECOMMENDATION

Referral to ORC for issuance of administrative civil complaint citing the notification violation.

Anne M. Robinson
CASE REVIEWER

4/1/94
DATE

Michael M. Hodgebert
CONCUR

CONCUR

4/21/94
DATE

DATE

TSCA PCB INSPECTION REPORT

FACILITY: Inland Empire Paper Company
3320 N Argonne Rd
Spokane, Wa 98212

MAILING ADDRESS: 3320 N Argonne Rd
Spokane, Wa 98212

INSPECTION DATE: February 3, 1994

INSPECTOR: Daniel R. Tangarone
Environmental Engineer
Engineering and Investigation Section
Environmental Services Division

RECEIVED
MAR 22 1994
PESTICIDES & TOXIC SUBSTANCE
BRANCH — EPA REGION 10

I met with Mr. Rick Fink, Technical Superintendent and Mike Reynolds, Electrical Foreman. I presented my credentials and discussed the purpose of the inspection. The TSCA Notice of Inspection and Inspection Confidentiality Notice were completed and signed by Mr. Fink.

I completed the EPA Region 10 TSCA Generator Request for Information. Annual document logs were requested for 1989 through 1992 along with copies of all manifests and Certificates of Disposal related to PCB shipments during that period. Analytical results for all oil filled transformers were requested. Quarterly inspection records for PCB transformers were requested but such records don't exist.

I went through the TSCA checklist and completed it to the extent possible. Waste oils generated at the plant are all hydraulic oils or gear oils. Transformer repair or servicing is contracted out and all oils are removed under contracts. There is no storage for disposal area. The only PCB equipment in use is a bank of 29 PCB capacitors (Photo 1). The individual capacitors are not labeled but the ML is on the outside of the enclosure housing the capacitors. The door to the vault housing the capacitors was not labeled.

We then toured the plant and observed the existing transformers in use. Transformer 37SS103005-3 (37.5 KVA Allis Chalmers) (Item 21 on Attachment H) was leaking and contained 37 gallons of oil. Attachment H indicates this transformer to be non-PCB and also shows the gallons of oil as the KG of PCB. Allis Chalmers transformer 2262640 (Item 22 on Attachment H) was leaking. This transformer is listed as non-PCB. At the de-inking location, a non-PCB transformer (MGM 91-51913 -- 3000KVA) was observed and was not leaking. The #7, #4, #3 and #5 Refiner transformers are now silicone. The #3 transformer (HDT01230101) was rebuilt in 1990 according to Mike Reynolds and is now silicone. Records don't indicate its status prior to that time. The #6 transformer is a Wagner B9C1037 with 1950 gallons of oil. It was leaking. This is item 13 on Attachment G -- shown as <50 ppm PCB. The #1 West transformer (PCR91061) was not leaking and was non-PCB. This transformer (#14 on Attach G) was discovered to be 290 ppm PCB in 1987 and was retrofilled per Mike Reynolds.

Company records on existing equipment in service are not very complete. The PCB log sheets were not kept up to date. Annual document logs were obtained for 1989 through 1992. Manifests during this period were also obtained. I gave a copy of section 761.180 Records and Monitoring to Mr Fink along with a copy of the 100 questions and answers regarding PCBs.

Attachment A Annual Document Logs for years 1989 through 1992.

These were given to me in response to my request for the Annual Document Logs for these years. Inland refers to them as "Annual PCB

Record."

- Attachment B Manifest 963QI (12/7/89) and Certificate of Disposal (11/7/90) which covers disposal of "drum of capacitors" (258 lbs.).
- Attachment C Draft of work order 49591 which refers to testing of 2 transformers at the domestic well with disposal of oil if found to contain PCB's and disposal of GE transformer 5928557 (341 ppm PCB -- see last page of Attachment C) which was declared surplus on 9/13/90 which had been in storage. Note that transformer 5928557 was not listed on the 1989 or 1990 Annual Document Log (Attachment A).
- In addition, the work order mentions a 2300 volt winder feed switch with oil of 140 ppm PCB tested 8/21/90.
- Attachment D Manifest number AZ02I (5/7/91) and certificate of disposal for shipment of transformer 5928557 and associated oil. Transformer 5928557 is not mentioned on the logs.
- Attachment E 4/15/82 PCB test results
- Attachment F 11/29/83 PCB test results for 3 transformers
- Attachment G 2/6/80 PCB test results for 27 items.
- Attachment H 1980 PCB log sheet. This does not reflect current status. Capacitor sheet shows notes written by me. Item 4 are in service minus 1 cap shipped out.
- Attachment I PCB log sheet noted thru 1989 and 1990.

Attachments

TSCA Notice Of Inspection
TSCA Inspection Confidentiality Notice
TSCA Receipt for Samples and Documents
Request For Information
Inspection Checklist

Attachments A - I



United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act
NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time	3. Firm Name
Date 2/3/94	Inspector No. 1705	Daily Seq. No.		Inland Empire Paper
4. Inspector Address 1200 6th Ave Seattle, Wa 98101				5. Firm Address 3320 N Argonne Spokane, Wa 99212

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

- ☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature <i>Daniel R. Tancogne</i>		Recipient Signature <i>Rich Fink</i>	
Name Daniel R. Tancogne		Name Rich Fink	
Title Environmental Engineer	Date Signed 2/3/94	Title Tech. Asst	Date Signed 2/3/94



United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

TSCA INSPECTION CONFIDENTIALITY NOTICE

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Firm Name
Date 2/3/94	Inspector No. 1709	Daily Seq. No.	Inland Empire Paper
3. Inspector Name Daniel R. Tangarone			4. Firm Address 3320 N Argonne Spokane, WA 99212
5. Inspector Address 1200 6th Ave Seattle, WA 98101			6. Chief Executive Officer Name Wayne Andresen
			7. Title Vice Pres & General Mgr

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of the Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice.

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Rick Fink</i>	Name
Name	Title
Title Tech Supt	Date Signed 2/3/94
Address	



United States Environmental Protection Agency
Washington, D.C. 20460

Toxic Substances Control Act

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Firm Name
Date 2/3/94	Inspector No. 1709	Daily Seq. No.	Inland Empire Paper
3. Inspector Address 1200 6th Ave Seattle, Wa 98101			4. Firm Address

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of the document(s) and/or sample(s) described is hereby acknowledged:

No.	Description
-	Manifest 12/1/89 w/attachments
-	" 5/7/91 w/attach
-	Testing results 2/6/80
-	PCB Log Sheet 1-32 + cap sheet
-	Test results 4/15/82 - Leaks 1-sheet
-	Annual PCB Record 92, 91, 90, 89
-	Test records 11/29/83
-	Handwritten PO request 9/13/90 (WO 49591) w/test results
-	Manifest 5/7/91
-	PCB Log Sheet for 1 cap (disposal 12/7/89)

Optional:

Duplicate or split samples: Requested and Provided ☐ Not Requested ☐

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature <i>Daniel E. Tangarone</i>		Recipient Signature	
Name Daniel E. Tangarone		Name	
Title Environmental Engineer	Date Signed 2/3/94	Title	Date Signed

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 10
REQUEST FOR INFORMATION: TOXIC SUBSTANCES CONTROL ACT
PCB GENERATOR (OR POTENTIAL GENERATOR) INSPECTION

FACILITY NAME	Inland Empire Paper
ADDRESS	3320 N Argonne
	Spokane, Wa 99212

- ① A copy of complete PCB Annual Documents (or Document Logs) for the years: 1989 - 1992.
- ② A copy of all manifests for PCBs shipped from facility since 1989 - current
- ③ A copy of all Certificates of Disposal for PCBs received since 1989 - current
- None ④ A copy of all Quarterly (or Annual) Inspection records since 11/1/89 for PCB Transformers in use or stored for reuse, pursuant to 40 C.F.R. § 761.30(a)(1)(ix), (x), and (xii).
- None ⑤ A copy of batch records for any bulk tanks of PCBs since _____.
- None ⑥ A copy of any registration information provided to appropriate fire response agency for any PCB Transformers in use or stored for reuse, since 12/1/85.
- ⑦ A copy of all sales records (or other records of disposition) for waste oils containing detectable levels of PCBs, which were delivered to oil recyclers or other parties, since _____.
- ⑧ A copy of all PCB analytical results for liquid-filled electrical equipment currently in storage, either for reuse or for disposal, or currently in use, at facility.
- ⑨ A copy of sales records (or other records of disposition) for all non-PCB Transformers (transformers containing less than 50 parts per million PCB) disposed of since 11/1/89 → current and a copy of analytical results for such transformers.
- ⑩ A copy of sales records (or other records of disposition) for all liquid-filled electrical equipment sold for reuse since _____, and a copy of analytical results for such equipment.
- ⑪ A copy of Notification of PCB Waste Activity (Form 7710-53) and confirming letter from EPA Headquarters.

DM Argonne
INSPECTOR SIGNATURE

2/3/94
DATE

ENVIRONMENTAL PROTECTION AGENCY TSCA INSPECTION CHECKLIST

Facility Name/Street Address

Inland Empire Paper

Yes No

Facility Representative / Title

Rick Fink - Technical Supr.

Mike Reynolds, Electrical Foreman

Inspection Date/Time

2/3/4 9am

Inspector Name / ID

DR Tangame

GENERAL

- ☒ ☒ Has any PCB equip been converted to PCB-Cont or Non-PCB equip? 761.30(a)(v) (140 ppm) i retrofit in switch
If yes, was PCB concentration tested after 3 mos of service? Obtain results
winder feed switch 4/9/22-8
- ☒ Have any PCB spills occurred at the facility? Obtain details
PCBs resulting from the cleanup and removal of spills, leaks, or other uncontrolled discharges, must be stored and disposed of in accordance with 40CFR § 761.60(a). Disposal of PCBs by any other manner constitutes the improper disposal of PCBs.

WASTE OILS

- ☒ Are waste oils tested for PCB's? 761.60(g)
- ☒ Are waste oils generated, used, or stored at the facility?
What is the source of the waste oils? Hydraulic fluids / gear oil
- ☒ Are waste oils picked up by a recycler?
Name of recycler? Budget Oil & (Waste Chemical) NW Entek
- ☒ Are waste oils burned at the facility?
If yes: Has facility notified EPA-RCRA as used oil burner?
- ☒ Have any waste oils (50-500ppm) been shipped to a disposal facility? Who?
- ☒ Have any waste oils (50-500ppm) been sold for fuel or burned in a high efficiency boiler?
If yes, was EPA notified of initial burn in the HEB? 761.60(a)(2)
- ☒ Are waste oils used or sold for: Road Oil, Dust Control, Rust Prevention, Sealants, Pesticide/Herbicide Carriers? 761.20(d)
- ☒ Are bulk storage tanks used for waste oils? (>55 gal DOT drum specs)
Is an SPCC plan available for PCB-Contaminated bulk storage tanks?
Are bulk storage tanks labeled? (Must label if PCB concentration is unknown or >50ppm.)
Are in-out records (date/amt) available for bulk storage? 761.65(c)(8)
Have PCB fluids (>500 ppm) ever been added to bulk storage tanks?
Have PCB Contam fluids (50-500 ppm) ever been added to <50 ppm PCB bulk storage tanks?

STORAGE FOR DISPOSAL 761.65

- ☒ Is there a designated Storage for Disposal Area (SFD)?
Marked with 6x6 M_L label?
Roofed?
Is rain prevented from reaching PCB's or PCB items?
Adequate walls provided?
Minimum 6" curbs provided around SFD?
Floor constructed of smooth, impervious materials?
Any drains or expansion joints present in the floor?
Any sewer drains or sumps located in the SFD?
Is containment volume adequate?
(At least 2x internal volume of the largest PCB article/container or 25% of the total internal volume of all PCB articles or containers in storage.)
- ☒ Is the SFD above the 100-yr flood water elevation?
- ☒ Are any PCB's or PCB items stored within the SFD? Itemize-obtain inventory
- ☒ Are items dated when placed into storage?
- ☒ Are items checked monthly for leaks?
- ☒ Are leaks cleaned up immediately? Are leaking items overpacked? _____
- ☒ Are PCB-T, PCB Containers, or PCB Capacitors marked with M_L?
- ☒ Are any PCB-T in storage? How many? _____
- ☒ Are any PCB-T declared "for disposal" stored outside of the SFD?
- ☒ Are any PCB-Contam Elec Equip or PCB-Cap declared "for disposal" stored outside the SFD?
If yes: 1. Is space = 10% of the volume of the Contaminated Trans available in the SFD?
2. Are weekly inspections for leaks performed?
- ☒ Are any other areas being used to store PCB items for disposal? 761.65(c)
- ☒ Are items Dated? _____ Marked? _____
- ☒ Is the 30 day temporary storage limit observed?
- ☒ Are containers in a temporary storage area marked with M_L and date removed from service?

STORAGE FOR DISPOSAL (Continued)

<u>Yes</u>	<u>No</u>	
	<input checked="" type="checkbox"/>	Are liquids in containers >500 ppm?
		If yes, are containers marked >500 ppm PCB?
		(Temporary storage is NOT allowed for PCB liquids (>500 ppm))
		Are PCB liquids (>500ppm) stored anywhere other than the SFD area?
<input checked="" type="checkbox"/>		Have any PCB's or PCB items been shipped to a disposal facility within the last 5 years?
		Are shipping papers/manifests available for shipments? <i>OBTAINED THOSE AVAILABLE</i>
		Are any Mineral-Oil-T in storage? How many? _____
		Are any Mineral-Oil-T in storage leaking?
		Have these Mineral-Oil-T been tested for PCB's? (Obtain Serial No's and Test Records)

TRANSFORMERS

	<input checked="" type="checkbox"/>	Are any PCB-T (>500 ppm) in use?
	<input checked="" type="checkbox"/>	Does facility own any PCB-T located in a Food/Feed facility? (Prohibited after 10/1/85)
		Are any PCB T in a Network or Radial configuration?
		What is the secondary voltage of the T?
		Are T tested for PCB's by Gas-Chromatograph?
		Have any PCB-T been installed (new location) since 10/1/85? Where? _____ When? _____
		Have all PCB-T been registered <i>In writing</i> with primary fire response agency? Obtain copy
		What is the Primary Fire Response Agency? _____
<input checked="" type="checkbox"/>		Were any leaking Mineral-Oil Transformers observed?
<input checked="" type="checkbox"/>		Were any leaking PCB-T or PCB-Contam-T observed? (Get serial numbers, location)
		Is clean-up of leaks initiated within 48 hours of discovery?
		Are daily checks of active leaks and drip pans made until leak is repaired or T is replaced?
<input checked="" type="checkbox"/>		Are PCB testing records available for all T? — <i>obtained available records,</i>
<input checked="" type="checkbox"/>		Are PCB testing records available for leaking Mineral-Oil Transformers? OBTAIN RECORDS —
		Are PCB-T labeled with 6x6 M _L ? — <i>NO PCB T ON SITE.</i>
	<input checked="" type="checkbox"/>	Have any Mineral-Oil-T been tested and found to be >500 ppm PCB?
<input checked="" type="checkbox"/>		Are means of access to PCB-T vaults/enclosures (exclude grates & manhole covers) marked w/ M _L ?
		Do all T have nameplates or documentation specifying type of dielectric fluid?
		Are PCB-T serviced on site?
		Are PCB contaminated rags/other wastes generated by servicing placed into drums in the SFD?
		Are PCB's removed from the T during servicing?
		If yes, are PCB's put back into the Transformer or placed into the SFD?
		Are PCB-T coils removed during servicing? (Prohibited)
	<input checked="" type="checkbox"/>	Are PCB liquids (>500 ppm) stored on site for servicing PCB-T? (Must be in SFD)
		Are service records available for PCB-T?
		Are Quarterly PCB-T inspections made (start 8-10-81)?
		Are Quarterly inspection records maintained for at least 3 years after disposal?
		Do Quarterly PCB-T inspection records include?
		Location _____ Inspection Date _____ Inspectors Name _____
		Date Leak Discovered _____ Location of Leak _____ Estimate of PCB released _____
		Date of Cleanup _____ Containment _____ Repair _____ Description of Cleanup _____
		Annual inspections may be performed in lieu of Quarterly IF:
		1. Secondary containment of 100% of the capacity of the T is provided or
		2. PCB Conc of T is <60,000ppm, 90 days after service to reduce the PCB conc.
	<input checked="" type="checkbox"/>	Have there been any fires involving PCB-T?
		If yes, Date? _____, Who responded? _____, Did T rupture? _____
		Was fire reported to National Response Center?
		Are combustible materials stored: Inside a PCB-T enclosure?
		Within 5 meters of a PCB-T enclosure?
		Within 5 meters of a PCB-T?

CAPACITORS

<input checked="" type="checkbox"/>		Are any PCB-Capacitors in use or in storage? How many? <i>29 in use</i>
<input checked="" type="checkbox"/>		Are ≥49 LHV or LLV C (3# PCB; or >200 in ³ ; or >100 but <200 in ³ and >9# tot wt) in use or storage?
		If yes, are these C included in the Annual Report?
		Are C marked with M _L ? (LHVC in service need to be marked) — <i>The individual capacitors are not marked but the capacitor bank (enclosed) is marked.</i>

* Access to a vault containing 29 PCB capacitors was not marked.

CAPACITORS (Continued)

<u>Yes</u>	<u>No</u>	
		Has facility ever had >49 LHV/LLV C in use or storage within the last 5 years?
		If yes, are annual reports on file for years when >49 C were in use or storage?
X		Have any C been removed from service?
		If yes, have C been individually labeled with M _L ? (7) shipped to disposal.
		Note: LLVC (>2000 volts) in service do not need M _L . LLVC (>2000 volts) must be labeled upon removal from service.
		Are all Caps equipped with nameplates specifying type of dielectric fluid? — could not see
		(Capacitors without nameplates must be assumed to be PCB Capacitors.)
	X	Are any PCB-C owned or maintained by the facility located in a Food or Feed Facility (FFF)?
		(These must be removed as of 10-1-88.)
X		Are any C manufactured after 7-1-78 in use at the facility?
		If yes, are these C marked "No PCB's" if they contain none?
	X	Were any leaking C observed during the inspection?
		Note: Use of PCB-C after 10/1/88 is prohibited except for:
		1. Restricted Access and Contained Indoor Installation (Caps must be fenced off)
		2. Restricted Access Substation (Caps must be fenced off)

ANNUAL DOCUMENTS

Annual Document Logs should constitute single documents which include all of the required elements identified in § 761.180(a).

Annual Records constitute all signed manifests and all Cert of Disposal received during the calendar yr.

		Are Annual Document Logs (ADL) and Annual Records (AR) available?
		Are ADL on calendar year basis? (§761.180(a)) -- 1990 must cover 1/1/89-2/4/90. 1991 (2/5/91-12/31/91)
		Are PCB-T removed from service itemized in ADL?
		Is the Total Weight (kg) of PCB's contained in these transformers shown?
		Date removed from service?
		Date placed into storage?
		Date placed into transport for disposal?
		Is Number of PCB-T and Total Wt (kg) of PCB's remaining in service at calendar year end shown?
		Are LHV/LLV PCB Capacitors removed from service itemized?
		Date removed from service?
		Date placed into storage?
		Date placed into transport for disposal?
		Is the number of PCB LHV/LLV Caps remaining in service at year end shown?
		Is the number of PCB Containers in the SFD area shown?
		Is the Weight (kg) of these PCBs also shown?
		Are the container contents identified?
		Are PCB items in containers listed?
		Date container placed into storage shown?
		Date container placed into transport for disposal shown?
		Are names/locations of disposal/storage facilities for PCB shipments shown?
		Have any intermediate storage/disposal areas been used for PCB items earmarked for disposal?
		Are ADL kept for 5 years?
		Do '90/'91 ADLs list manifest nos for all shipments during year, followed by info id in §761.180(a)(2)(ii)(C)?
		Do '90/'91 ADLs list total no of PCB containers and the total wt in KG of the contents of PCB containers?

Obtained & those available.

SPECIAL QUESTIONS

	X	Are any Diarylide or Phthalocyanin pigments in use or storage? 761.30(g) —
	X	Is any PCB mining equipment used or located at facility? 761.30(c)
	X	Are any Railroad-T in use or located at facility? 761.30(b)
		Was PCB conc measured after service or within 12-24 mo after PCB conc was reduced?
		Are records kept of service, testing, use, storage, and disposal? (Must keep until 1-1-91)
	X	Are any heat transfer systems containing PCB's in use? 761.30(d) — Steam
		Are annual tests for PCB concentration made? Date of last test?
		Have any annual tests shown PCB concentration to be >50ppm?
		If yes, has system been drained and refilled with <50ppm PCB fluid?
		Are these annual testing records kept for 5 years?
X	X	Are any PCB Electromagnets in use or storage at the facility? How many? 1
		Have Electromagnets been tested for PCB concentration?
		NOTE: Non-PCB fluid may be used to top-off Electromagnets. (Removal of internals prohibited)

SPECIAL QUESTIONS (Continued)

<u>Yes</u>	<u>No</u>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Are Hydraulic systems containing PCB's in use? 761.30(e)
<input type="checkbox"/>	<input type="checkbox"/>	Has annual testing for PCB concentration been performed since 11/01/79?
<input type="checkbox"/>	<input type="checkbox"/>	NOTE: Annual tests are not required after PCB concentration reaches <50ppm.
<input type="checkbox"/>	<input type="checkbox"/>	Have any annual tests shown PCB concentration to be >50ppm?
<input type="checkbox"/>	<input type="checkbox"/>	If yes, has system been drained and refilled within 6 mos of test with <50ppm PCB fluid?
<input type="checkbox"/>	<input type="checkbox"/>	Was exemption obtained from EPA for use of hydraulic fluid containing >50ppm PCB?
<input type="checkbox"/>	<input type="checkbox"/>	NOTE: Hydraulic Systems containing >50 ppm PCB are PROHIBITED after 7/1/84.

COMMERCIAL BUILDING REGULATIONS

<input type="checkbox"/>	<input type="checkbox"/>	Are means of access to PCB-T locations (excluding grates & manhole covers) marked with M _L ?
<input type="checkbox"/>	<input type="checkbox"/>	Are any commercial buildings located on facility property? (Building w/public & employee access)
<input type="checkbox"/>	<input type="checkbox"/>	Are any PCB-T IN or WITHIN 30 METERS of the Commercial Building?
<input type="checkbox"/>	<input type="checkbox"/>	If yes, how many? ____ Where located? _____
<input type="checkbox"/>	<input type="checkbox"/>	Who owns the PCB-T? _____
<input type="checkbox"/>	<input type="checkbox"/>	If owned by Utility, are the PCB-T registered IN WRITING with building owner?
<input type="checkbox"/>	<input type="checkbox"/>	If owned by the building owner, are PCB-T registered in writing with fire department?
<input type="checkbox"/>	<input type="checkbox"/>	Are any PCB-T located in a sidewalk vault?
<input type="checkbox"/>	<input type="checkbox"/>	Do they have current-limiting fuses (or other equivalent protection) to detect:
<input type="checkbox"/>	<input type="checkbox"/>	Sustained high current faults?
<input type="checkbox"/>	<input type="checkbox"/>	Sustained low current faults?
<input type="checkbox"/>	<input type="checkbox"/>	Are PCB-T: Radial? ____ Network? ____ High Secondary Voltage 480V? ____
<input type="checkbox"/>	<input type="checkbox"/>	Low secondary voltage? ____
<input type="checkbox"/>	<input type="checkbox"/>	Do LSV Network and HSV Radial PCB-T in/near the Cmercl Bldg have enhanced elect protect?
<input type="checkbox"/>	<input type="checkbox"/>	Current-limiting fuses? ___, Overcurrent protective relays? ___, Circuit Breakers? ____
<input type="checkbox"/>	<input type="checkbox"/>	Heat or Ultraviolet sensors? ___, Pressure sensors? ___, Fluid Level Sensor? ____

INSPECTION PROCEDURES

<input checked="" type="checkbox"/>	<input type="checkbox"/>	Were Inspector's credentials presented?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Was "Notice of Inspection" presented?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Was "TSCA Inspection Confidentiality Notice" presented?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Were photographs taken?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Were samples taken during the inspection?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Was a "Receipt for Samples and Documents" given to the facility representative?
<input type="checkbox"/>	<input type="checkbox"/>	Were Chain of Custody procedures followed for samples?
<input type="checkbox"/>	<input type="checkbox"/>	Were split samples offered to the facility?
<input type="checkbox"/>	<input type="checkbox"/>	Were split samples given to the facility?
<input type="checkbox"/>	<input type="checkbox"/>	Was warrant required?

Reason for Inspection: Neutral Scheme _____ Complaint _____ Informant _____

Agency Referral _____ Follow-Up _____

Multimedia _____

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 92 THROUGH DEC. 31, 92.

As of December 31, 1991, we had on hand at our Inland Empire Paper Co. facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following capacitors were in use, on site, at the end of the year:

29 Capacitors --- Page 2 of Equipment Lab, Item #4

Signature

Wayne D. Andersen

Title

General Manager

(A)

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 91 THROUGH DEC. 31, 91.

As of December 31, 1991, we had on hand at our Inland Empire Paper Co. facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following capacitors were in use, on site, at the end of the year:

29 Capacitors --- Page 2 of Equipment Lab, Item #4

Signature

Wayne D. Andresen

Title

GEN. MGR.

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 90 THRU DEC 31, 90.

As of December 31, 1990, we had on hand at our Inland Empire Paper Co. facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following capacitors were in use, on site, at the end of the year.

29 Capacitors --- Page 2 of Equipment Log, Item #4

The capacitor that was on-site from 5/15/89 until 12/7/89, when it was received by Westco, was incinerated on 10/7/90 by Aptus at Coffeyville, KS, EPA ID #KS0980964993.

Signature Wayne D. Andresen
Title General Manager

SUBJECT: ANNUAL PCB RECORD

REPORTING PERIOD JAN. 1, 89 THRU DEC 31, 89.

As of December 31, 1989, we had on hand at our Inland Empire Paper Co. facility -0- kilograms of PCB insulating fluids in transformers.

In capacitors, weight unknown, the following capacitors were in use, on site, at the end of the year.

29 Capacitors --- Page 2 of Equipment Log, Item #4

Removed from service with time in storage was the following one capacitor:

Item #4 --- Page 1 of the 1989 Equipment Log, May 15 - Dec. 7, 1989

Signature Wayne D. Andresen

Title Asst. Gen. Mgr.

APTUS

August 9, 1991

Aptus
Environmental Services

P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

JIM CLIFT
INLAND EMPIRE PAPER
N 3320 ARGONNE RD.
SPOKANE, WA 99220-

RE: Aptus Document No. AZ02I

Dear JIM CLIFT:

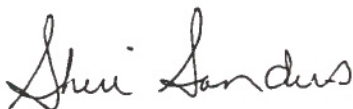
Enclosed, please find your Certificate of Disposal from Aptus, which certifies that your waste material received on the manifest referenced has been properly disposed. Also, enclosed is a detail summary of the movement of your material.

Aptus would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

Should you have any questions regarding our services, please contact one of our offices from 8:00 AM to 5:00 PM.

24 Hour Spill Response call 1-800-292-2558 or (316)251-6380.

Sincerely,



SHERI SANDERS
PCB DOCUMENT ADMINISTRATOR

Enclosure

APTUS

August 9, 1991

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

CERTIFICATE OF DISPOSAL

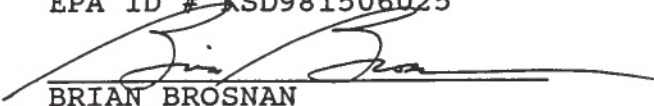
NO. 7956

INLAND EMPIRE PAPER
N 3320 ARGONNE RD.
SPOKANE, WA 99220-

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO **APTUS** ON APTUS DOCUMENT #AZ02I WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 761 AS OF 08/05/91. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S) (A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

APTUS

EPA ID # KSD981506025


BRIAN BROSNAN
MANAGER, ENVIRONMENTAL AFFAIRS

Aptus

DETAIL REPORT

PAGE NO. 1

GENERATOR
INLAND EMPIRE PAPER
N 3320 ARGONNE RD.

SPOKANE WA 99220-
EPA # 40CFR PART 761
PHONE: 5099241911
JIM CLIFT
CODE: 0009884

CORRESPONDENT
WESCO
E 2025 TRENT AVE./BOX 2987

SPOKANE WA 99220
PHONE: 5094567501
MR F PAGUET
CODE: 0009885

WORKORDER # 80190
APT DOC # AZ02I
CUST MANIFEST:

STATE MANIFEST:

DATE OF REPORT: 08/09/91
SALESMAN: ROSS STENGUIST
HOLD BACK: 0%

ITEM	PROTYPE	CNT	DESCRIPTION	SERIAL/DRUM #	CONCEN	UNT	WT	QTY	UNT	LOCATN	DISPOSAL FACILITY	SHIPMAN	CONUMBER	ACCEPTED	OUT/SRVC	SHIP	DESTROYD	COSENT
1	TRANS	1	TRANSFORMER	5928557	341	PPM	280	12.60	Cu ft	9048000	CHEMICAL WASTE MGMT, EMELLE, AL	CBM77	7956	05/17/91	09/13/90	06/27/91	06/28/91	08/09/91
2	NOIL	1	5GA. N-17H	1 of 1/D2	1	PPM	98	5.00	Gallo	0000000	INCKS	CBT84	7956	05/17/91	09/13/90	07/24/91	08/05/91	08/09/91
3	OIL	1	10GA.	1 of 1/D1	88	PPM	150	10.00	Gallo	0000000	DETKS	1445	7956	05/17/91	09/13/90	07/16/91	07/17/91	08/09/91
4	OIL	1	TRANSFORMER	5928557	341	PPM	40	9.00	GALS	0000000	INCKS	CB053	7956	05/17/91	09/13/90	06/26/91	07/05/91	08/09/91

MANIFESTS ON JOB NUMBER 80190
AZ02I



PURCHASE ORDER

INLAND EMPIRE PAPER COMPANY

N. 3320 ARGONNE
SPOKANE, WASHINGTON 99212

PHONE 509/924-1911

Westinghouse Electric Supply
P.O. Box 2987
Spokane, WA. 99220

DATE March 7, 1991

P.O. NO. 22565

SUBMIT ALL INVOICES IN DUPLICATE
SHOWING OUR ORDER NUMBER

PLEASE ENTER OUR ORDER FOR THE FOLLOWING:

Removal and Disposal of GE Transformer

#5928557 and Three 5 Gallon Pails of Oil

Price: \$1,065.00

CONFIRMATION

ACCT. NO. W49591 PCB Disposal

PLEASE ACKNOWLEDGE WITH SHIPPING DATE

Inland Empire Paper Company

VIA

PER

PURCHASING AGENT

WESTINGHOUSE ELECTRIC SUPPLY COMPANY

W E S C O
BOX 2987
SPOKANE, WA 99220

MARCH 6, 1991

INLAND EMPIRE PAPER
N. 3320 ARGONNE
SPOKANE, WA. 99212
ATTN. JIM CLIFT

PCB REMOVAL
QUOTE # 40911

DESCRIPTION

1 LOT PCB REMOVAL , DISPOSAL PER THE FOLLOWING :

APTUS OF COFFEYVILLE, KANSAS WILL MANIFEST, PICK-UP, TRANSPORT
AND INSURE PROPER EPA DISPOSAL OF ITEMS LISTED .

DISPOSAL OF THESE ITEMS WILL CONFORM TO EPA REGULATIONS SET FORTH
IN 40 CFR 761.60 RELATING TO THE ELECTRICAL EQUIPMENT DISPOSAL.

OWNER IS RESPONSIBLE FOR LOADING MATERIAL ONTO APTUS DISPOSAL
VEHICLE. QUOTATION ALLOWS FOR TWO (2) HOURS OF LOADING TIME. IF
MORE THAN THE ALLOTTED TIME IS REQUIRED, A MINIMUM CHARGE OF
\$80.00/HR WILL BE ADDED.

DESCRIPTION	PCB CONTENT	GALLONS	WEIGHT
TRANSFORMER	341 PPM	2	165
5 GALLON PAIL	20 PPM	5	54
5 GALLON PAIL	20 PPM	5	54
5 GALLON PAIL	140 PPM	5	54
.....LOT			\$1,065.00
			NET 30

DELIVERY :

FREIGHT TERMS :
PREPAID AND INCLUDED IN ABOVE
QUOTED PRICE.

QUOTATION FIRM FOR 30 DAYS.

WESCO TERMS AND CONDITIONS
ON THE BACK.

SIGNED

F. PAQUET

(509) 456-7501

FAX

(509) 456-7528

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 4 0 C F R P A R T 7 6 1 A Z 0 2 I		Manifest Document No. 2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Inland Empire Paper N 3320 Argonne RD. Spokane, WA 99220				A. State Manifest Document Number			
4. Generator's Phone (509) 924-1911				B. State Generator's ID			
5. Transporter 1 Company Name Aptus, Inc.				6. US EPA ID Number M N D 9 8 0 7 9 1 3 2 1		C. State Transporter's ID	
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone 612-469-3475	
9. Designated Facility Name and Site Address Aptus, Inc. P.O. Box 1328/Hwy. 169 North Coffeyville, KS 67337				10. US EPA ID Number K S D 9 8 0 9 6 4 9 9 3		E. State Transporter's ID	
						F. Transporter's Phone	
						G. State Facility's ID	
						H. Facility's Phone 316-251-6380	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers No. Type		13. Total Quantity	
a. PCB's				0 0 1 C M		EST 0 0 0 7 5 K	
b. PCB's				0 0 1 D M		EST 25 0 0 0 4 9 K	
c. NON HAZARDOUS, NON REGULATED, SPECIAL WASTE				0 0 1 D M		EST 0 0 0 4 9 K	
d.							
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
a. transformer filled with oil <500 ppm Storage Date 9-13-90				b. drum of oil <500 ppm Storage Date 9-13-90			
c. drums of oil <50 ppm PCB Storage Dates 9-13-90							
15. Special Handling Instructions and Additional Information See Enclosed Contingency Plan Work Order #80190 EMERGENCY CONTACT: 1-800-292-2558							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment: OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name G. Michael Reynolds				Signature G. Michael Reynolds		Month Day Year 1 1 1 9 1 1	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature Lonnie Yarnell		Month Day Year 1 1 1 9 1 1	
Printed/Typed Name Lonnie Yarnell				Signature Lonnie Yarnell		Month Day Year 1 1 1 9 1 1	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Month Day Year	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space Discrepancies Ok'd by Jim Clift 5-29-91 a. 1 transformer filled <500 220 lbs., 100 kgs., b. 1 dm oil <500 150 lbs., 68 kgs., c. 1 dm oil <50 98 lbs., 44 kgs. <i>new</i>							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name David Cook				Signature David Cook		Month Day Year 1 1 1 9 1 1	

①

Westinghouse
Electric Corporation

Advanced Industrial
Systems Divisions



Engineering Services
1180 Andover Park West
Seattle, WA 98188
(206) 575 2345

January 30, 1991

Inland Empire Paper
N 3320 Argonne
Spokane, Wa. 99212

Reference: S 7647

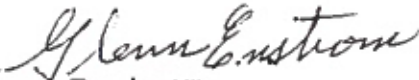
Subject: Oil Analysis
WESCO Order No. DS6103-591633
Our Job No. SEED694

Gentlemen:

Attached is a copy of the test results from the lab on your equipment. The results should be self-explanatory. However, if you have any questions, feel free to call on us.

Very truly yours,

WESTINGHOUSE ELECTRIC CORPORATION


Glenn Enstrom
Senior Sales Engineer

LMN/dz
attachment

cc: F. Paquet, WESCO, Spokane

WESTINGHOUSE ELECTRIC CORPORATION
Engineering Services Division

Lab Test Report

Westinghouse Electric Corporation
P. O. Box 3938
Seattle, Wa. 98124

Date: 1/30/91
P. O. Number: DS6103-591633
Customer: WESCO

Below is a listing of the samples received on 12/12/90 together with the laboratory results on their respective PCB content.

UTILITY SERIAL NO.	COMPANY NO.	MISC.	AROCOLOR	PPM
W049122-8	#1 Winder Feed	Switch	1260	1
W049122-9	#2 New Well CB			ND
864128	#3 East Trans	D Well		ND
5810137	#4 West Trans	D Well		ND

APTUS

November 7, 1990

Aptus
Environmental Services

P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Ingenerator FAX (316) 251-0089

JIM CLIFT
INLAND EMPIRE PAPER
N 3320 ARGONNE
SPOKANE, WA 99212

RE: INLAND EMPIRE PAPER, Aptus Document No. 963QI

Dear JIM CLIFT:

Enclosed, please find your Certificate of Disposal from Aptus, which certifies that your waste material received on the manifest referenced has been properly disposed. Also, enclosed is a detail summary of the movement of your material.

Aptus would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

Should you have any questions regarding our services, please contact one of our offices from 8:00 AM to 5:00 PM.

24 Hour Spill Response call 1-800-292-2558 or (316)251-6380.

Sincerely,



SHERI SANDERS
PCB DOCUMENT ADMINISTRATOR

Enclosure

disposal of corp

(B)

P.O. Box 1328
Colleyville, KS 67337
(316) 251-6390
(800) 292-2558
FAX (316) 251-7498
Sales FAX (316) 251-1095
Confidential FAX (316) 251-0091
Incinerator FAX (316) 251-0089

December 29th 1989

APTUS

MR F PAQUET
WESCO
E 2025 TRENT A/BOX 2987
SPOKANE, WA 99220

RE: INLAND EMPIRE PAPER, Aptus Document No. 963QI

Dear MR F PAQUET:

Enclosed, please find your copy of the hazardous waste manifest indicating that your waste material has been received and accepted by Aptus, formerly National Electric Inc. Immediately following the disposal of all your material, you will receive a complete Certificate of Disposal from Aptus.

Once again, Aptus would like to express our appreciation to you as a valued customer.

Should you have any questions, please feel free to contact our Environmental Affairs personnel from 8:00 AM to 5:00 PM, Monday through Friday.

Sincerely,

Shirley Sanders

Environmental Affairs

Enclosure

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No WA		Manifest Document No. 96301		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Inland Empire Paper N 3320 Argonne Spokane, WA 99212						A. State Manifest Document Number							
4. Generator's Phone (509) 924-1911						B. State Generator's ID							
5. Transporter 1 Company Name Aptus		6. US EPA ID Number WA 96301		C. State Transporter's ID		D. Transporter's Phone 612-469-3475							
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone							
9. Designated Facility Name and Site Address Aptus P.O. Box 1328/Hwy. 169 North Coffeeville, AL 36537		10. US EPA ID Number		G. State Facility's ID		H. Facility's Phone 318-251-8380							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total		14. Unit		15. Waste No.	
						No. Type		Quantity		Wt/Vol			
						a. RC WASTE HAZARDOUS SUBSTANCE, SOLID, W.O.S., (POLYCHLORINATED BIPHENYLS) ORM-E NA 9188		001		EST. 001260		P	
						b.							
						c.							
J. Additional Descriptions for Materials Listed Above a. drum of capacitors = 258 lbs.						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information See Enclosed Contingency Plan Work Order #37431													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name JAMES P CLIFT					Signature <i>James P Clift</i>			Month Day Year 12 6 94					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name KEITH SWISART					Signature <i>Keith Swisart</i>			Month Day Year 11 20 94					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name					Signature			Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name David P. H... ..													
Signature <i>David P. H...</i>					Month Day Year 12 11 94								

APTUS

November 7, 1990

Aptus
Environmental Services

P.O. Box 1328
Colleyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

CERTIFICATE OF DISPOSAL

NO. 2816

INLAND EMPIRE PAPER
N 3320 ARGONNE
SPOKANE, WA 99212

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO APTUS ON APTUS DOCUMENT #963QI WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 264 AS OF 10/07/90. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S) (A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

APTUS
EPA ID # KSD980964993


BRIAN BROSANAN
MANAGER, ENVIRONMENTAL AFFAIRS

Aptus DETAIL REPORT

Page no. 1

generator INLAND EMPIRE PAPER N 330 ALCOYNE SPOKANE, WA 99212 EPA # Phone: 509-524-1911 JIM OLF COBOD	correspondent WESCO E 3025 TRENT AVE 2507 SPOKANE, WA 99220 EPA # Phone: 509-456-7501 WA F PADGET COBOD	order # 9701 Aptus Doc. # 963QI Dist. Method: State Method: Date of report: 7-10-79 Date checked in: 12/14/88 Salesman: TOM SZYM Hold back: 0
---	---	---

LINE	QEST	TYPE	EXT DESCRIPTION	SERIAL	QDC	UNIT STORE	HEIGHT QJAH	UNIT PL LOC	DR PL TO SENT	FACILITY	WASDIT	DESTROY	CDREC	CDSENT	QAL	DATE/TIME		
1			INOS CAPS	0		1 OF 17	11/14/88	258	258	CO LB	C 1202	9/28/90	Incinerator, Colleyville, TX	C100Y	10/17/90	10/10/90	11/17/90	15 dec-1988 12 24 51

FROM

02,00,1991 10:04

NO. 2 P. 0

9-13-90

Jim Clift

PCB - Transformer with Oil

PCB - Switch Oil

After we get PCB test results back from two transformers at the Domestic Well we will want to Dispose of:

① G.E. Transformer #5928557 1½ KVA
with PCB Oil 21" across X 21" tall.
Declared Surplus Sept. 13, 1990.
(Was in Storage for Reuse.)

② 3 Plastic 5gal. Pails of PCB Oil
12½" Dia X 15" tall Each Pail
Removed from Service Sept. 13, 1990.

③ Plus any PCB Oil that may be in the
(2) Two Transformers at the Domestic Well.
The transformers will remain in service.

We May Have to Buy 17-C Drum or Drums.

WO. 49591

Dispose of PCB Oil

Ed Orr

①

9-13-90

P.C.B.

We have used in the Past
the Following Companies to
Dispose of PCB oil and Equip.

Eastern Electric

Larry Robinson 206-767-9506

10831 E. Marginal Way S.

Seattle, WA. 98168

Westinghouse Electric Supply Co. 456-7501

P.O. Box 2987

E. 2025 Trent Ave.

Spokane, WA. 99220

WESCO uses - Aptus Environmental Services

P.O. Box 550

21750 Cedar Ave.

Lakeville, MN. 55044

612-469-3475

Fax 612-469-5140

9-13-90

P.C.B.

W.O. 49591

2300 Volt - Window Feed Switch - Transformer Station

Oil 140 PPM PCB tested 8/21/90

Service Switch - Drain Oil - Mark used oil "P.C.B."

Place Oil on Pallet S.W. Corner

1 only 5gal Pail up stairs in Old Finish Room.

Clean Switch - Fill with New Oil.

How was oil
stored + disposed

2300 Volt - New well circuit breaker - Tran.

Oil 20 PPM PCB tested 8-21-90

Service Switch - Drain Oil - Mark used Oil P.C.B.

Place Oil on Pallet S.W. Corner

2 only 5gal Pails up stairs in Old Finish Room

Clean Switch - Fill with New Oil.

1 only

G.E. Transformer # 5928557 1 1/2 KVA

aprox 14" Dia X 20" tall

unused - Surplus

341 PPM PCB, tested 8/21/90

Mark "PCB"

Place on Pallet S.W. Corner

up stairs in Old Finish Room.

We will have someone properly dispose
of the PCB Oil and Transformer.

E.C.C.F.

9-13-90

P.C.B.

Purchase (4) Four Sample Kits to test for P.C.B.

Test: ① 2300 Volt Winder Feed Switch - Transformer

② 2300 Volt New Well Circuit Breaker - Transformer

③ Transformer # 864128 5 kilowatts
480 V. / 110-220 V. Type H 60cy Form H
July 23, 1907 M 5799
approx 15" dia X 21" tall
East Wall of Domestic Well.

May be ④ Spokane Transformer Co
Dry type Ser # 5810137 10 KVA Imp. 2.7%
Transformer 480 / 120-240 V
approx 14" dia. X 25" tall
West Wall of Domestic Well.

WO, 49591

P.C.B. Oil test kits.

EDOT

Westinghouse
Electric Corporation

Advanced Industrial
Systems Divisions

Engineering Services
1180 Andover Park West
Seattle, WA 98188
(206) 575 2345

September 5, 1990

WESCO
E. 2025 Trent Avenue
P. O. Box 2987
Spokane, Wa. 99220

REF
P.O. 21307

Attention: Frank Paquet

Subject: Oil Analysis
Your Order No. W/S 6103-559458
Our Job No. SEED576

Gentlemen:

Attached is a copy of the test results from the lab on your equipment. The results should be self-explanatory. However, if you have any questions, feel free to call on us.

Very truly yours,

WESTINGHOUSE ELECTRIC CORPORATION

Glenn Enstrom

Glenn Enstrom
Senior Sales Engineer

LMN/dz
attachment

WESTINGHOUSE ELECTRIC CORPORATION
Engineering Services Division

Lab Test Report

Westinghouse Electric Corporation
P. O. Box 3938
Seattle, Wa. 98124

Date: 8/21/90
P. O. Number: SEED576
Customer: WESCO, Spokane

Below is a listing of the samples received on 8/15/90 together with the laboratory results on their respective PCB content.

UTILITY SERIAL NO.	COMPANY NO.	MISC.	AROCOLOR	PPM
WO 49122-1	37SS103005-2	SIN PHASE	1260	1
WO 49122-2	2252640	CTR SIN PH	1260	2
WO 49122-3	37SS103005-3	S SIN PH	1260	2
WO 49122-4	✓ TRAN STATION	N CAP SWIT	1260	2
WO 49122-5	✓ TRAN STATION	S CAP SWIT		ND
WO 49122-6	✓ 1,2,3,VAC	PUMP SWIT		ND
WO 49122-7	✓ F.D. FAN	2300V		ND
WO 49122-8	✓ WINDER FEED	SWITCH	1260	140
WO 49122-9	✓ NEW WELL CB	2300V	1260	20
WO 49122-10	ROLL GRIND	OIL SWITCH	1260	2
WO 49122-11	5928557	TRAN C WH	1260	341
WO 49122-12	N NEW WELL	STARTER		ND
WO 49122-13	S WELL PUMP	SWITCH		ND

ABC Laboratories, Inc.

4922 East Union Ave. Spokane, Washington 99212 (509) 534-0161

Client's No. 010641

Lab. No. 1662-83

Date Nov. 29, 1983

REPORT

Report to: Inland Empire Paper Company
North 3320 Argonne Road
Spokane, WA 99206

Description: Perform analyses for Polychlorinated
Biphenyls (PCB's) on three submitted
samples.

<u>Sample</u>	<u>Serial No.</u>	<u>PCB's mg/kg</u>
East Transformer, Westinghouse	43B623	*1
Center Transformer, Westinghouse	422907	*1
West Transformer, General Elec.	67815.1	*1

Respectfully submitted
A. B. C. LABORATORIES, INC.

NOV 30 1983

W. E. Burkhardt
W. E. Burkhardt
Manager

(F)

GENERAL ELECTRIC

GENERAL ELECTRIC COMPANY . . . E. 1805 TRENT AVENUE, P.O. BOX 2848
TERMINAL ANNEX, SPOKANE, WASHINGTON 99220, Phone (509) 455-6535

INSTALLATION & SERVICE
ENGINEERING DIVISION

ELECTRICAL & ELECTRONIC
SERVICE DEPARTMENT

April 19, 1982

RE: OIL SAMPLES
YOUR P/O 8014

CC: George Logan
Inland Empire Paper Company

James P. Clift
Purchasing Agent
Inland Empire Paper Company
N. 3320 Argonne
Spokane, Washington 99206

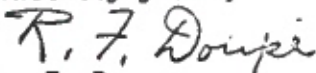
Dear Jim:

Attached is test data from Laucks Lab in Seattle for your 5 oil samples. None of these samples had over 500 PPM PCB, so it will not be necessary for you to label them.

I would suggest that you file this test certificate in a place where it will not get lost. This information may be necessary if you want to repair any of these units in the future.

Also as requested, attached is 6 each of PC-4N PCB label.

Sincerely yours,


Roy F. Doupe
AREA MANAGER

Encls.

RFD/ims

2 dxy

(E)

Laucks

Testing Laboratories, Inc.

940 South Harney Street, Seattle, Washington 98108 (206) 767-5060

Chemistry, Microbiology, and Technical Services



Certificate

437P 6320-2

CLIENT General Electric Company
East 1805 Trent Avenue
Spokane, WA 99220
Attn: Roy F. Doupe

LABORATORY NO. 76310

DATE April 15, 1982

P.O. #SPO820402

REPORT ON OIL

SAMPLE
IDENTIFICATION

Marked: 1) A-1 GE S/N 1974 989 Trans. Sta.
2) C. West 25KVA Fin. Rm.
3) W. West 25KVA Fin. Rm.
4) E. G.E. 25KVN Fin. Rm.
5) G.E. 5 KVA Yard.

TESTS PERFORMED
AND RESULTS:

	1	2	3	4	5
PCBs, mg/kg	60	<5	<5	<1	<1

Key

< denotes "less than"

Respectfully submitted,
LAUCKS TESTING LABORATORIES, INC.

Timothy E. Runyan
Timothy E. Runyan

TER:ks



This report is submitted for the exclusive use of the person, partnership, or corporation to whom it is addressed. Subsequent use of the name of this company or any member of its staff in connection with the advertising or sale of any product or process will be granted only on contract. This company accepts no responsibility except for the due performance of inspection and/or analysis in good faith and according to the rules of the trade and of science.

Laucks

Testing Laboratories, Inc.

1008 Western Avenue Seattle Washington 98104 (206) 622-0727

Chemistry, Microbiology, and Technical Services



Certificate

CLIENT General Electric Company
E. 1809 Trent Avenue
Spokane, WA 99202
Attn: Art Thorson

LABORATORY NO. 69208

DATE Feb. 6, 1980

REPORT ON TRANSFORMER OIL

P.O. 437X6232

Identification: Inland Empire Paper Co. samples submitted 1-30-80

1.	#1	Basement	South Tank	O.C.B.	W	SN/1-37Y2813
2.	#2	Basement	Center "	O.C.B.	W	"
3.	#3	"	North "	"	"	"
4.	#4	"	"	P.T.	"	"
5.	#5	"	South	"	"	"
6.	#6	"	"	C.T.	Wagner	SN/12216
7.	#7	"	North	"	G.E.	"
8.	#8	"	South	Trans.	"	1974989
9.	#9	"	"	"	"	1974988
10.	#10	"	"	"	"	1974987
11.	#11	"	"	"	W	SEV8061-01
12.	#12	"	"	"	W	SJB8060-01
13.	#13	"	"	"	Wagner	B9C1037
14.	#14	"	"	"	W	PCR-91061
15.	#15	"	Storage	C.T.	Wagner	12215
16.	#16	"	"	"	G.E.	2461862
17.	#17	"	"	"	Wagner	12214
18.	#18	Sta. Annex	North	O.C.B.	G.E.	TYPE FK20
19.	#19	"	Center	"	"	"
20.	#20	"	South	"	"	"
21.	#21	Hi Grade Control	Room	Trans.	A.C.	3755103005
22.	#22	"	"	"	"	2262640
23.	#23	"	"	"	"	3755103005
24.	#24	3 & 4 Machine #3	Basement	"	W	East
25.	#25	"	"	"	"	Center
26.	#26	"	"	"	"	West
27.	#27	Basement New Oil	Storage			

Lab No.

PCBs, mg/kg

1	Less/50
2	Less/50
3	Less/50
4	Less/50



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④

Laucks

Testing Laboratories, Inc.

1008 Western Avenue, Seattle, Washington 98104 (206) 622-0727

Chemistry, Microbiology, and Technical Services



Certificate

General Electric Company

PAGE NO. 2

LABORATORY NO. 69208

<u>Lab No.</u>	<u>PCBs, mg/kg</u>
5	Less/50
6	Less/50
7	Less/50
8	(55)
9	Less/50
10	Less/50
11	Less/50
12	Less/50
13	Less/50
14	290
15	Less/50
16	Less/50
17	Less/50
18	Less/50
19	Less/50
20	Less/50
21	Less/50
22	Less/50
23	Less/50
24	Less/50
25	Less/50
26	Less/50
27	Less/50

Respectfully submitted,

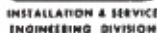
Laucks Testing Laboratories, Inc.

Timothy E. Runyan
Timothy E. Runyan

TER:ks



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EQUIPMENT IN SERVICE

THRU 1989
AND 1990

[illegible]

* ASKERAL = 12.5 LBS/GAL.
OIL = 7.5 LBS/GAL.



PCB LOG SHEET

EQUIPMENT IN SERVICE

1980

ITEM NO.	DATE LISTED	EQUIPMENT	CLASSIFICATION PCB PCB CONTAM NON PCB	EQUIPMENT LOCATION	TOTAL PCB WEIGHT (KG)*	DATE TO STORAGE/ DISPOSAL	STORAGE/ DISPOSAL FACILITY LOCATION	COMMENTS
1	2/11	O.C.B. "W" S/N 1-37Y2813	Non PCB	Basement South Tank	205 E			
2	"	O.C.B. "W" S/N 1-37Y2813	"	Basement Center Tank	"			
3	"	O.C.B. "W" S/N 1-37Y2813	"	Basement North Tank	"			
4	"	P.T.	"	Basement North	100			
5	"	P.T.	"	Basement South	100			
6	"	S/N 12216 C.T. "Wagner"	"	Basement South	40			
7	"	C.T. GE S/N	"	Basement North	40			
8	"	Transformer GE S/N 1974989	PCB CONTAM	Basement South	1200			
9	"	Transformer GE S/N 1974988	NON PCB	Basement	1200			
10	"	Transformer GE S/N 1974987	"	Basement	1200			
11	"	Transformer "W" S/N SEV8061-01	"	Basement				
12	"	Transformer "W" S/N SJV8060-01	"	Basement				
13	"	Transformer Wagner S/N B9C1037	"	Basement	1950			
14	"	Transformer "W" S/N PCR-91061	PCB CONTAM	Basement	1972			
15	"	C.T. Wagner S/N 12215	NON PCB	Basement Storage	20			
16	"	C.T. GE S/N 2461862	"	Basement Storage	45			

*ASKERAL = 12.5 LBS/GAL.
OIL = 7.5 LBS/GAL.
(2.2 LBS/KG.)
ISE TN 223(9/79)

GENERAL ELECTRIC

H



PCB LOG SHEET

EQUIPMENT IN SERVICE

ITEM NO.	DATE LISTED	EQUIPMENT	CLASSIFICATION PCB PCB CONTAM NON PCB	EQUIPMENT LOCATION	TOTAL PCB WEIGHT (KG)*	DATE TO STORAGE/ DISPOSAL	STORAGE/ DISPOSAL FACILITY LOCATION	COMMENTS
17	2/11	C.T. Wagner S/N 12214	NON PCB	Basement Storage	20			Should Scrap
18	"	O.C.B. GE TYPE FK20	"	Sta. Annex North	4			
19	"	O.C.B. GE TYPE FK20	"	Sta. Annex Center	4			
20	"	O.C.B. GE TYPE FK20	"	Sta. Annex South	4			
21	"	Transformer A.C. S/N 3755103005	"	Hi Grade Control Room	37			
22	"	Transformer A.C. S/N 2262640	"	Hi Grade Control Room	37			
23	"	Transformer A.C. S/N 3755103005	"	Hi Grade Control Room	37			
24	"	Transformer "W" EAST	"	3&4 Mach. #3 Basement	40			
25	"	Transformer "W" CENTER	"	3&4 Mach. #3 Basement	40			
26	"	Transformer "W" WEST	"	3&4 Mach. #3 Basement	40			
27	"	Basement New Oil Storage "			200			
28	4/15/2	Transformer G.E. S/N-1974989	PCB Contam.	Finishing Room	(same as item 18)			
29	4/15	Transformer C. West 25 KVA	Non PCB	Finishing Room				
30	4/15	Transformer W. West 25 KVA	Non PCB	Finishing Room				
31	4/15	Transformer E. GE 25 KVA	Non PCB	Finishing Room				
32	4/15	GE 5 KVA	Non PCB	Yard Storage				

*ASKEAL - 12.5 LBS/GAL.
OIL - 7.5 LBS/GAL.
(2.2 LBS/KG.)
(SE 1N 22310/79)

GENERAL ELECTRIC



1980

[illegible]

* ASKERAL = 12.5 LBS/GAL.
OIL = 7.5 LBS/GAL.
(2.2 LBS/KG.)
USE IN 100/100/100

Inland Empire Paper

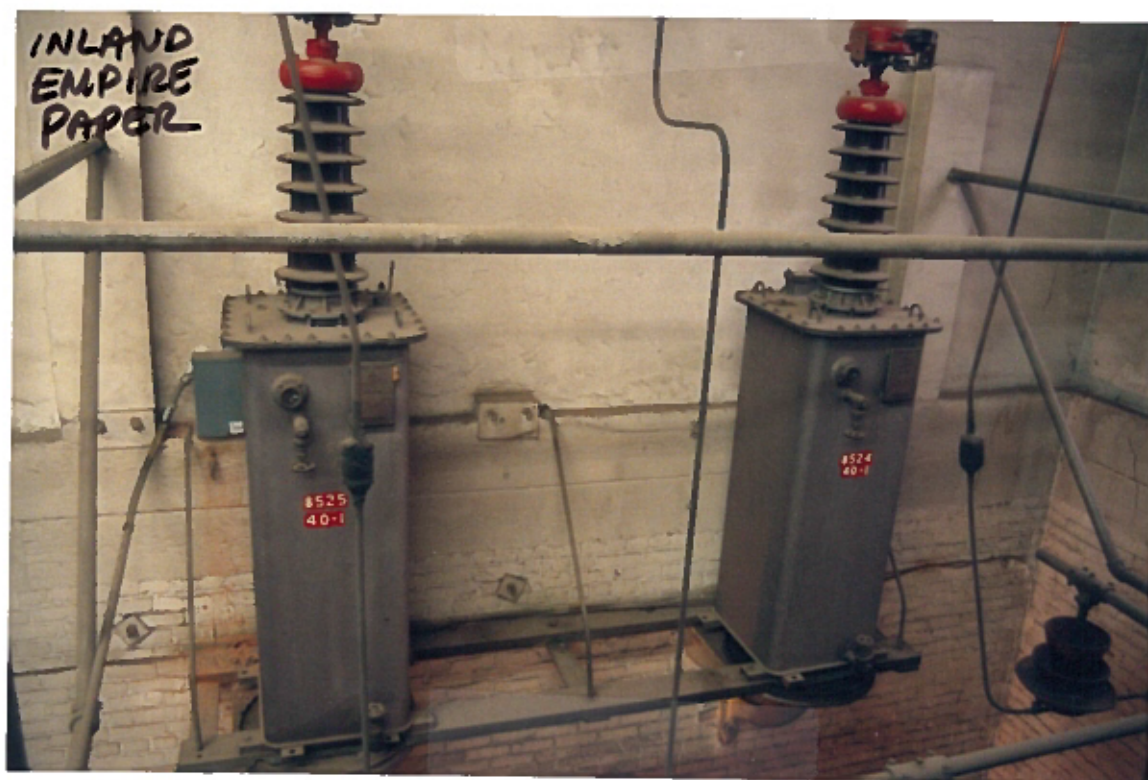


Photo #1 Capacitor Bank



Photo #2 Allis Chalmers Transformers

Non-PCB
Equipment



Non-PCB
Equipment

